

Hearing Date: September 28, 2022 at 10:00 a.m.
Objection Deadline: September 21, 2022 at 5:00 p.m.

CULLEN & DYKMAN LLP
100 Quentin Roosevelt Boulevard
Garden City, NY 11530
(516) 357-3700
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
Michael Traison, Esq.

Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
	:	
MONTAUK CLIFFS, LLC,	:	Case No. 22-70312 (REG)
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	:	
Debtor.	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that on September 28, 2022 at 10:00 a.m., Montauk Cliffs, LLC (the “Debtor”), by and through its attorneys Cullen and Dykman LLP, will move (the “Fee Application”) before the Robert E. Grossman, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Eastern District of New York, located at Alfonse M. D’Amato U.S. Courthouse, 290 Federal Plaza, Central Islip, New York 11722, Courtroom, 860, or as soon thereafter as counsel can be heard, for an Order Approving the First and Final Application for Allowance of Compensation for Professional Services Rendered and Expenses Incurred by Cullen and Dykman LLP as Counsel to the Debtor for the Period from February 23, 2022 Through and Including August 12, 2022.

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to the Fee Application must be made in writing, conform to the Bankruptcy Rules and the Local Bankruptcy Rules for the Bankruptcy Court and be filed with the Bankruptcy Court electronically in accordance with General Order 559 (a copy of which can be found at www.nyeb.uscourts.gov, the official website for the United States Bankruptcy Court for the Eastern District of New York), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and shall be served upon: (i) Cullen and Dykman LLP, 100 Quentin Roosevelt Blvd, Garden City, New York 11530, attention: Bonnie L. Pollack, Esq.; (ii) the Office of the United States Trustee for the Eastern District of New York, 560 Federal Plaza, Central Islip, New York 11722; and (iii) all parties who have filed a notice of appearance and request for service of documents, so as to be actually received by no later than 5:00 p.m. (prevailing Eastern Time) on September 21, 2022.

Dated: Garden City, New York
August 30, 2022

CULLEN AND DYKMAN LLP
Attorneys for Debtor

By: /s/ Bonnie L. Pollack
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
Michael Traison, Esq.
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In re: : Chapter 11
MONTAUK CLIFFS, LLC, : Case No. 22-70312 (REG)
Debtor. :
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FEE APPLICATION SUMMARY SHEET

**FIRST AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION
FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS COUNSEL
TO THE DEBTOR FOR THE PERIOD FROM FEBRUARY 23, 2022
THROUGH AND INCLUDING AUGUST 12, 2022**

Name of Applicant:	Cullen and Dykman LLP
Name of Client:	Montauk Cliffs, LLC
Authorized to Provide Professional Services as:	Counsel to the Debtor
Petition Date:	February 23, 2022
Date of Retention:	March 17, 2022 <i>nunc pro tunc</i> to February 23, 2022
Date of Order Approving Employment:	March 17, 2022

Blended Rate in this Application for all Timekeepers:	\$760.34
Period for which Compensation and Expense Reimbursement is Requested:	February 23, 2022 to August 12, 2022
Total Requested Compensation:	\$188,945.00
Total Requested Expense Reimbursement:	\$2,629.88
Compensation Sought in this Application Already Paid Pursuant to a Monthly Compensation Order but not yet Allowed:	\$0.00
Expenses Sought in this Application Already Paid Pursuant to a Monthly Compensation Order but not yet Allowed:	\$0.00
Number of Professionals Included in this Application:	Three (3)
Total Compensation and Expenses Previously Requested:	\$0.00
Total Compensation and Expenses Previously Awarded:	\$0.00
Name, Billing Rate, and Department of Attorneys Included in this Application:	See Exhibit E
Total Hours:	248.5
This is a first and final fee application.	

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Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
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MONTAUK CLIFFS, LLC,	: Case No. 22-70312 (REG)
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Debtor.	: :
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**FIRST AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION
FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS COUNSEL TO
THE DEBTOR FOR THE PERIOD FROM FEBRUARY 23, 2022
THROUGH AND INCLUDING AUGUST 12, 2022**

Cullen and Dykman LLP (“C&D”), bankruptcy counsel to Montauk Cliffs, LLC, the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby submits this first and final application (the “Fee Application”) seeking entry of an order, substantially in the form attached hereto as Exhibit A, granting allowance of compensation and reimbursement of expenses pursuant to sections 328, 330 and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the Eastern District of New York (the “Local Rules”), and General Order 630, the *Guidelines for Fees and Disbursements for Professionals in Eastern District of New York Bankruptcy Cases*, effective as

of June 4, 2013 (the “Fee Guidelines”), seeking allowance and payment (subject to the Fee Carve Out as defined below) of fees in the amount of \$188,945.00 and reimbursement of expenses in the amount of \$2,629.88, for services rendered and expenses incurred during the period from February 23, 2022 through August 12, 2022, for which no prior application has been considered by this Court (the “Application Period”). In support of the Fee Application, C&D respectfully represents as follows:

Preliminary Statement

During the Application Period, C&D has expended considerable amounts of time, effort, and resources assisting the Debtor’s efforts to, among other things, (a) prepare and file with the Court the Debtor’s schedules, statements of financial affairs and monthly operating reports and prepare for attendance at the 341 meeting of creditors; (b) extensive negotiation and effectuation of the sales process regarding the Debtor’s property located at 38-42 Old Montauk Highway, New York (the “Property”); (c) negotiation, preparation, approval and confirmation of the Debtor’s Disclosure Statement and Chapter 11 Plan; (d) prepare and obtain approval of motions; and (e) assist the Debtor with various administrative matters in its case.

C&D respectfully submits that its dedicated efforts during the Application Period have provided a substantial benefit to the Debtor’s estate. Therefore, C&D respectfully requests that this Fee Application be approved in its entirety and paid up to the amount of the Retainer and Fee Carve Out (both as defined herein), with the unpaid amounts being waived by C&D.

Jurisdiction

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested

herein are sections 328, 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Rule 2016-1, and the Fee Guidelines.

Background

2. On February 23, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.

3. The Debtor has remained in possession of its property as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

4. On March 2, 2022, the Debtor filed an Affidavit (the “Wilner Affidavit”) pursuant to Local Rule 1007-4. A more detailed factual background of the Debtor’s Property, as well as the events leading to the filing of this chapter 11 case, is more fully set forth in the Wilner Affidavit, the contents of which are incorporated herein by reference.

5. On March 16, 2022, the Debtor filed an application with the Court to employ C&D as its bankruptcy counsel, which application was approved by the Court on March 17, 2022, *nunc pro tunc* as of the Petition Date. As set forth therein, C&D requests compensation on an hourly basis. Prior to the Petition Date, C&D received a \$15,000 retainer (the “Retainer”) to be applied to fees and expenses incurred post-petition. A true and correct copy of the Order approving the employment and retention of C&D as counsel to the Debtor is attached hereto as

Exhibit B.

6. C&D now submits its Fee Application requesting approval of professional fees in the amount of \$188,945.00 and reimbursement of expenses in the amount of \$2,629.88 for services rendered and expenses incurred during the Application Period. This is the Debtor’s first and final request for compensation and reimbursement of expenses in this case. The Debtor has been provided with the Fee Application and has approved its contents.

7. As set forth in the certification of Matthew G. Roseman, Esq. dated August __, 2022 (the “Roseman Certification”), attached hereto as **Exhibit C**, this Fee Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Fee Guidelines.

8. In accordance with section 504 of the Bankruptcy Code and Rule 2016 of the Bankruptcy Rules, no agreement or understanding exists between C&D and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

9. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by C&D.

10. On August 12, 2022, the Court entered an order confirming the Debtor’s Second Amended Chapter 11 Plan.

11. The Debtor is current on the payment of quarterly fees to the U.S. Trustee and has filed all monthly operating reports that are due for the post-petition period.

12. As of July 31, 2022, the Debtor had cash on hand or on deposit and securities in the amount of \$160.00 with no accrued and unpaid administrative expenses, other than the amounts requested herein. There are no unencumbered estate funds.

Summary of Services Rendered

13. As more fully described herein, C&D has provided substantial legal services to the Debtor during the Application Period. Pursuant to the Fee Guidelines, a summary of the total time expended and amount of compensation sought for each of the project categories is attached hereto as **Exhibit D**. A listing of the name, title, practice group, and first year of bar admission, if applicable, for each professional person who rendered services to the Debtor, along with a summary of the total hours billed and total amount of billing for each professional, is attached

hereto as **Exhibit E**. Attached hereto as **Exhibit F** is a detailed computer-generated summary of the time expended by each professional and the services rendered by C&D as counsel to the Debtor in each category during the Application Period. Indicated below are each category and the compensation sought by C&D for services performed on the Debtor's behalf in each category:

1. General Administration	\$24,237.50
3. Asset Disposition, Sale or Restructuring	\$67,100.00
4. Resolution of Creditor Issues	\$8,078.00
5. Plan and Disclosure Statement	\$50,901.50
8. Retention of Professionals and Fee Statements	\$6,940.50
9. Preparation For/Attend Court Hearings	\$19,496.50
11. Disbursements	\$2,629.88
12. Motion Practice	\$5,630.00
13. Travel(billed at one-half hourly rate)	\$3,577.50
14. Operating Reports	\$2,983.50

14. During the Application Period, C&D has expended a total of 248.5 hours in this matter for total requested compensation of \$188,945.00 at its usual and customary hourly rates. The average blended hourly rate was \$760.34. Although C&D is requesting allowance of compensation totaling \$188,945.00, it has agreed with the Lender a carve out of \$150,000 for its fees and expenses (the "Fee Carve Out"), exclusive of the Retainer, with the remaining amounts being waived by C&D.

15. During the Application Period, C&D has incurred expenses totaling \$2,629.88. Attached hereto as **Exhibit G** is a summary of the expenses incurred during the First Application Period for which reimbursement is sought herein. Copying charges are assessed at \$.10 per copy. Reimbursement for those costs, as well as all other disbursements in this case, is sought in accordance with the applicable Local Rules.

16. C&D has set forth below a narrative of the legal services provided to the Debtor in order to inform the Court of the legal services rendered to the Debtor by C&D during the Application Period. The summary of services performed by C&D is only intended to highlight the general categories of services provided by C&D on the Debtor's behalf. It is not intended to set forth each and every item of professional services that C&D performed for the Debtor. All of the services for which compensation is sought herein were performed for, or on behalf of, the Debtor.

Category 1
Chapter 11 Administration

17. The first category of services rendered by C&D relates to those services required for the Debtor's general case administration.

18. In that regard, C&D performed extensive services relating to the administration of the Debtor's case including as necessary to ensure the orderly transition into chapter 11.

19. C&D also assisted the Debtor in responding to inquiries and concerns of various creditors and constituencies, as well as the myriad other issues that arose day-to-day, particularly during the early stages of the chapter 11 case.

20. Services rendered by C&D in the first category of services include:

- Communications with the Court on the logistical matters with respect to the Debtor's bankruptcy filing and hearings;

- Communications with the Debtor regarding numerous bankruptcy administration issues;
- Communications with creditors regarding the Debtor's case;
- Preparation of Debtor's 1007 Affidavit;
- Preparation of the Debtor's Schedules, Statement of Financial Affairs, and amendments to the Debtor's Schedules, as needed;
- Assist the Debtor in preparation for and participation in the Initial Debtor Interview including compilation of documents for U.S. Trustee;
- Preparation for and attendance at the Section 341 meeting of creditors;
- Communications regarding the Debtor's bank accounts;
- Communications regarding insurance obligations, financing and payments; and
- Communications regarding tax returns requested by the IRS

21. In rendering services relating to this category, C&D attorneys expended 31.8 hours, for requested compensation at their customary and usual hourly rates of \$24,237.50, as follows:

- Matthew G. Roseman - 3.4 hours for total compensation of \$2,788.00
- Bonnie L. Pollack - 20.5 hours for total compensation of \$15,682.50
- Michael Traison - 2.9 hours for total compensation of \$5,767.00

C&D's blended hourly rate for services rendered in this category is \$762.19.

Category 3
Asset Disposition or Sales

22. This category of services relates to the sale and disposition of the Debtor's Property. The considerable services performed in this category include:

- Strategizing with respect to the sale of the Debtor's Property;

- Extensive communication with the Debtor's Lender regarding the sale of the Debtor's Property and the terms thereof;
- Interviews of numerous brokers and communications regarding same;
- Participation with the Lender in the selection of the broker;
- Review and negotiation of the broker's engagement agreement;
- Review and communications regarding the appraisal of the Property;
- Extensive negotiation of the sale process;
- Preparation of the terms of the sale for inclusion in the Debtor's plan;
- Continued communications with the selected broker regarding marketing strategy;
- Reviewed marketing reports; and
- Preparation of sale motion and order.

23. In rendering services relating to this category, C&D attorneys expended 85.3 hours, for requested compensation at their customary and usual hourly rates of \$67,100.00, as follows:

- Matthew G. Roseman - 46.6 hours for total compensation of \$38,212.00
- Bonnie L. Pollack - 18.2 hours for total compensation of \$13,923.00
- Michael Traison - 20.5 hours for total compensation of \$14,965.00

C&D's blended hourly rate for services rendered in this category is \$786.64.

Category 4
Resolution of Creditor Issues

24. This category of services relates to the Debtor's resolution of the treatment of the Lender's claim and the carve-outs from the Lender.

25. In rendering services relating to this category, C&D attorneys expended 10 hours, for requested compensation at their customary and usual hourly rates of \$8,078.00, as follows:

- Matthew G. Roseman - 8.1 hours for total compensation of \$6,642.00
- Bonnie L. Pollack - 1.4 hours for total compensation of \$1,071.00
- Michael Traison - .5 hours for total compensation of \$365.00

C&D's blended hourly rate for services rendered in this category is \$807.80.

Category 6
Plan and Disclosure Statement

26. This category of services relates to C&D's efforts in connection with the Debtor's Plan and Disclosure Statement. During the Application Period, C&D extensively negotiated the Plan with the Lender and thereafter drafted and filed the Debtor's Chapter 11 Plan and Disclosure Statement. The Plan and Disclosure Statement were thereafter amended and the Disclosure Statement approved.

27. Prior to confirmation, C&D oversaw the solicitation process and prepared the Certification of Ballots received. C&D prepared and filed the Debtor's Affidavit in support of confirmation, Memorandum of Law in support of Confirmation, proposed Confirmation Order, and prepared testimony and a proffer for confirmation. After confirmation, C&D prepared and filed Notices of Entry of the Confirmation Order.

28. In rendering services relating to this category, C&D attorneys expended 65.5 hours, for requested compensation at their customary and usual hourly rates of \$50,901.50, as follows:

- Matthew G. Roseman - 18.0 hours for total compensation of \$14,760.00
- Bonnie L. Pollack - 41.9 hours for total compensation of \$32,053.50
- Michael Traison - 5.6 hours for total compensation of \$4,088.00

C&D's blended hourly rate for services rendered in this category is \$777.12.

Category 8
Retention/Professional Compensation/Fee Statements

29. This category of services provided by C&D relates to the retention of professionals and compensation in the Debtor's bankruptcy proceedings. During the Application Period, C&D performed services for the Debtor in this category including the following:

- Preparation of application and affidavit to retain C&D as Debtor's counsel;
- Preparation of application and affidavit to retain the broker; and
- Preparation and filing of all C&D monthly fee statements.

30. In rendering services relating to this category, C&D attorneys expended 8.9 hours, for requested compensation at their customary and usual hourly rates of \$6,940.50, as follows:

- Matthew G. Roseman - 2.4 hours for total compensation of \$1,968.00
- Bonnie L. Pollack - 6.5 hours for total compensation of \$4,972.50

C&D's blended hourly rate for services rendered in this category is \$779.83.

Category 9
Preparation For/Attend Court Hearings

31. This category of services relates to C&D's preparation for and attendance at hearings on the various matters related to this case.

32. C&D prepared for and attended case conferences, status hearings, the hearing to approve the Disclosure Statement and the hearing to confirm the Plan.

33. In rendering services relating to this category, C&D attorneys expended 24.4 hours, for requested compensation at their customary and usual hourly rates of \$19,496.50, as follows:

- Matthew G. Roseman - 15.1 hours for total compensation of \$12,382.00
- Bonnie L. Pollack - 9.3 hours for total compensation of \$7,114.50

C&D's blended hourly rate for services rendered in this category is \$799.04.

Category 11
Disbursements

34. This category relates to disbursements expended by C&D during the Application Period. C&D has not rendered services in this category. Rather this category is utilized solely for itemizing the expenses for which C&D seeks reimbursement herein.

Category 12
Motion Practice

35. This category of services relates to C&D's efforts to prepare motions requesting various forms of relief from the Bankruptcy Court.

36. C&D spent time during the Application Period preparing the motion to approve insurance financing and the motion to set a bar date for filing claims in the Debtor's case.

37. In rendering services relating to this category, C&D attorneys expended 9.8 hours, for requested compensation at their customary and usual hourly rates of \$5,630.00, as follows:

- Bonnie L. Pollack - 5.6 hours for total compensation of \$4,284.00
- Michael Traison - .2 hours for total compensation of \$146.00
- Amanda Tersigni - 4.0 hours for total compensation of \$1,200.00

C&D's blended hourly rate for services rendered in this category is \$574.49.

Category 13
Travel

38. This category accounts for the travel time necessary in this case, billed at one-half the hourly rate. C&D attorneys spent 8.9 hours in travel time, at one-half their regular hourly rates for total requested compensation of \$3,577.50, as follows:

- Matthew G. Roseman - 6.3 hours for total compensation of \$2,583.00
- Bonnie L. Pollack - 2.6 hours for total compensation of \$994.50

C&D's blended hourly rate for these services amounts to \$401.97.

Category 14
Operating Reports

39. This category of services relates to C&D's assistance with the monthly operating reports submitted to the Bankruptcy Court and U.S. Trustee.

40. In rendering services relating to this category, C&D attorneys expended 3.9 hours, for requested compensation at their customary and usual hourly rates of \$2,983.50, as follows:

- Bonnie L. Pollack - 3.9 hours for total compensation of \$2,983.50

C&D's blended hourly rate for services rendered in this category is \$765.00.

Summary of Application

41. C&D submits that compensation for the services rendered and reimbursement of expenses incurred as set forth in this Fee Application is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation comparably skilled for bankruptcy professionals in New York; and (v) the experience and ability of the attorneys providing services. With respect to each of these standards, C&D submits that the compensation requested is reasonable and appropriate.

42. As set forth above, while C&D requests approval of its total fees and expenses, payment of same will be capped at the sum of the Retainer and the Fee Carve Out, with the remaining amounts being waived.

Applicable Legal Standards

43. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals retained under section 327 of the Bankruptcy Code, as follows:

- (1)(A) reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person employed by any such person; and
- (B) reimbursement for actual, necessary expenses.

* * *

(3) In determining the amount of reasonable compensation to be awarded to . . . a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a).

44. C&D respectfully submits that the hours worked by C&D's personnel were reasonable and necessary given the numerous and oftentimes complex, novel, and intricate issues which arose during this case. Further, C&D believes that the time spent was justified by the results that have been achieved.

45. The rates being charged by C&D are commensurate with, if not less than, those typically charged by other firms in the Eastern District of New York as well as those of other nationally-recognized firms specializing in bankruptcy.

46. C&D submits that the professional services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Fee Application were necessary and appropriate for the orderly administration of the Debtor's chapter 11 case. The professional services performed by C&D preserved and protected the value of the Debtor's assets for the benefit of all parties-in-interest.

47. The services rendered were performed within a reasonable amount of time by professionals with the seniority and skill level commensurate with the complexity, importance, and nature of the problem, issue or task addressed. Whether reviewed individually as to each of the tasks described above or collectively as a whole, the professional services were performed expediently and efficiently to accomplish the needs of the Debtor in this chapter 11 case.

48. C&D submits that the compensation sought in this Fee Application is reasonable and necessary under the applicable standards. Approval of the compensation for professional services and reimbursement of expenses sought herein is warranted. C&D therefore respectfully requests that the Court grant the Fee Application.

Notice

49. Notice of this Fee Application has been provided to all creditors and parties in interest. The Debtor respectfully submits that further notice of this Fee Application is neither required nor necessary.

Conclusion

50. C&D has worked diligently during the Application Period to help the Debtor to address a wide array of issues in this case to date. Accordingly, C&D submits that its services have provided substantial value to the Debtor's estate and requests that this Fee Application be approved in its entirety, and paid up to the sum of the Retainer and the Fee Carve Out.

WHEREFORE, for the reasons set forth herein, C&D respectfully requests that the Court enter an Order (a) approving C&D's fees in the amount of \$188,945.00 and reimbursement of expenses in the amount of \$2,629.88 in connection with this Fee Application; (b) authorizing and directing the Debtor's payment of such sums to C&D up to the amount the Retainer and the Fee Carve Out; and (c) granting such other relief as the Court deems is just and proper.

Dated: Garden City, New York
August 30, 2022

CULLEN AND DYKMAN LLP

By: s/ *Bonnie Pollack*
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
100 Quentin Roosevelt Boulevard
Garden City, NY 11530
(516) 357-3700

Counsel for the Debtor

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

MONTAUK CLIFFS, LLC,

Debtor.

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Chapter 11

Case No. 22-70312 (REG)

**ORDER ALLOWING FIRST AND FINAL APPLICATION FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Upon the application (the “Application”) of Cullen and Dykman LLP (“C&D”), counsel to Montauk Cliffs, LLC (the “Debtor”), for allowance of compensation for professional services rendered and reimbursement of expenses incurred for the period of February 23, 2022 through and including August 12, 2022 (the “Application Period”); and it appearing that the Court has jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and 11 U.S.C. §§ 330 and 331; and due notice of the Application having been provided to: (i) counsel for the Debtor’s lender; (ii) the Debtor; (iii) all entities who have file a notice of appearance and request for service of pleadings pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure; (iv) the U.S. Trustee; and (v) all creditors and parties in interest in the Debtor’s bankruptcy case; and no objection to the Application having been filed or any such objection having been resolved or overruled, and it appearing that no further notice of the Application is necessary; and upon the record made at the hearing on the Application held before the Court on _____, 2022; and after due deliberation and sufficient cause therefore, it is hereby:

ORDERED, that the Application is granted and the fees and disbursements requested by C&D in the Application as set forth on Schedule A(1) attached hereto are hereby awarded on a final basis; and it is further

ORDERED, that C&D is authorized and directed to apply the Retainer (as such term is defined in the Application) to the amounts awarded hereunder; and it further

ORDERED, that the Debtor is hereby authorized and directed to pay C&D from proceeds of the sale of the Debtor's Property the amount of the Fee Carve Out.

SCHEDULE A (1)**CURRENT AND ONLY FEE PERIOD**

Case No. 22-70312 (REG)

Case Name: Montauk Cliffs, LLC

Compensation Period: February 22, 2022 – August 12, 2022

Applicant	Docket Number of Application	Total Fees Requested	Total Expenses Requested	Total Fees Awarded	Total Expenses Awarded
Cullen and Dykman LLP		\$188,945.00	\$2,629.88	\$	\$

Exhibit B
Retention Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
Montauk Cliffs, LLC,	: Case No. 22-70312 (REG)
	:
Debtor,	:
	:
-----X	

**ORDER AUTHORIZING THE RETENTION OF
AND DYKMAN LLP AS COUNSEL TO THE DEBTOR
EFFECTIVE AS OF THE PETITION DATE**

Upon the application dated March 15, 2022 (the “Application”)¹ of Montauk Cliffs, LLC, the above-captioned debtor and debtor-in-possession (the “Debtor”) for entry of an order, pursuant to section 327(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Bankruptcy Rules for the Eastern District of New York (the “Local Rules”), authorizing the retention and employment of Cullen and Dykman LLP (“C&D”) as counsel to the Debtor, effective as of the Petition Date; and upon the affidavit of Matthew G. Roseman, Esq., a member of C&D, sworn to on March 15, 2022 (the “Roseman Affidavit”), which includes the statement of C&D pursuant to section 329 of the Bankruptcy Code and Bankruptcy Rule 2016; the Court finds that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, this is a core matter pursuant to 28 U.S.C. § 157(b)(2), notice of the Application was sufficient under the circumstances and that no further notice need be given; C&D is “disinterested” and eligible for retention pursuant to sections 101(14) and 327(a) of the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

Bankruptcy Code, the terms of the engagement are reasonable and appropriate, and the legal and factual bases set forth in the Application, Roseman Affidavit and Klaynberg Affidavit establish just cause for the relief granted herein, it is hereby

ORDERED, that the Application is granted to the extent provided herein; and it is further

ORDERED, that the Debtor is hereby authorized, pursuant to sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016 and 5002, and Local Rule 2014-1, to retain and employ C&D as counsel to represent it as debtor and debtor-in-possession effective as of the Petition Date on the terms set forth in the Application and the Roseman Affidavit, with the compensation of and expense reimbursement to C&D to be hereafter fixed by this Court upon the filing of a proper application or applications therefor under 11 U.S.C. §§ 330 and 331 and/or in accordance with any Court order establishing procedures for interim or periodic compensation; and it is further

ORDERED, prior to any increases in C&D's rates for any individual employed by C&D and providing services in this case, C&D shall file a supplemental affidavit with the Court and provide ten business days' notice to the Debtor, the U.S. Trustee and any parties in interest that have filed a notice of appearance and request for notices. The supplemental affidavit shall explain the basis for the rate increases in accordance with Section 330(a)(3)(F) of the Bankruptcy Code. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided for in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to Section 330 of the Bankruptcy Code; and it is further

ORDERED, that C&D is authorized to perform the following services:

- (a) Advising the Debtor with respect to its power and duties in the continued operation of its business and management of its property as a debtor and debtor-in-possession;
- (b) Taking all necessary actions to protect and preserve the value of the estate of the Debtor and related matters;
- (c) Representing the Debtor before this Court, and any other court of competent jurisdiction, on matters pertaining to its affairs as a debtor and debtor-in-possession;
- (d) Representing the Debtor in any avoidance actions or other adversary proceeding commenced by or against the Debtor;
- (e) Advising and assisting the Debtor in the preparation and negotiation of a plan of reorganization with its creditors and other parties in interest;
- (f) Advising the Debtor in connection with financing matters;
- (g) Advising the Debtor in connection with the sale of its assets;
- (h) Preparing all necessary or appropriate applications, motions, complaints, answers, orders, reports and other legal documents;
- (i) Performing all other legal services for the Debtor that may be desirable and necessary in this Chapter 11 case; and it is further

ORDERED, that the terms of this Order shall be immediately effective and enforceable upon its entry; and it is further

ORDERED, that to the extent the Application and engagement letter are inconsistent with this Order, the terms of this Order shall govern; and it is further

ORDERED, that C&D shall use its best efforts to avoid duplication of services provided

by any of the Debtor's other retained professionals in this chapter 11 case; and it is further

ORDERED, that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

No Objection:

s/William Birmingham

Office of the United States Trustee

**Dated: Central Islip, New York
March 17, 2022**



A handwritten signature in black ink, appearing to read "Robert E. Grossman".

**Robert E. Grossman
United States Bankruptcy Judge**

Exhibit C

Certification of Matthew Roseman

CULLEN & DYKMAN LLP
100 Quentin Roosevelt Boulevard
Garden City, NY 11530
(516) 357-3700
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
Michael Traison, Esq.

Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X	
In re:	: Chapter 11
MONTAUK CLIFFS, LLC,	: Case No. 22-70312 (REG)
	: :
Debtor.	: :
-----X	

**CERTIFICATION IN SUPPORT OF FIRST AND FINAL APPLICATION FOR
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN
AND DYKMAN LLP AS COUNSEL TO THE DEBTOR
FOR THE PERIOD FROM FEBRUARY 23, 2022
THROUGH AND INCLUDING AUGUST 12, 2022**

I, Matthew G. Roseman, hereby certify that:

1. I am a partner with the applicant firm, Cullen and Dykman LLP ("C&D"), which serves as counsel to Montauk Cliffs, LLC (the "Debtor") in this chapter 11 case, and am admitted to appear before this Court.

2. I have reviewed Rule 2016-1 of the Local Bankruptcy Rules for the Eastern District of New York (the "Local Bankruptcy Rules"), and General Order 613, the *Guidelines for Fees and Disbursements for Professionals in the Eastern District of New York*, dated June 4, 2013 (the "Fee Guidelines").

3. This certification is made in respect of compliance with the Guidelines in connection with C&D's application (the "Application") dated August 30, 2022, for final compensation and reimbursement of expenses for the period commencing February 22, 2022 through and including August 12, 2022 (the "Application Period").

4. In respect of Section B(1) of the Fee Guidelines, I certify that:

- a. I have read the Application;
- b. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Guidelines;
- c. The fees and disbursements sought in this Application are billed at rates and are in accordance with practices customarily employed by C&D and are generally accepted by C&D's clients; and
- d. In providing reimbursable service, C&D does not make a profit in its performance of reimbursable services, whether the service is performed inhouse or through a third party.

5. In respect of Section B(2) of the Fee Guidelines, I certify that C&D provided fee statements to the Debtor monthly by the 21st day of the succeeding month. The statements included the amount of fees and out-of-pocket expenses incurred, lists of professionals and paraprofessionals providing services, their respective billing rates, the work hours expended by each individual, descriptions of services rendered, and a reasonably detailed breakdown of out-of-pocket expenses incurred.

6. In accordance with Section B(3) of the Fee Guidelines, I certify that C&D provided copies of this Application to the Debtor and the United States Trustee, at least 21 days before the date for the hearing scheduled to approve same.

7. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, I certify that no agreement or understanding exists between C&D and any other entity for the sharing of compensation received or to be received for services rendered in or in connection

with the above cases except as authorized pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. All services for which compensation is sought were professional services on behalf of the Debtor and not on behalf of any other person.

Dated: Garden City, New York
August 30, 2022

CULLEN AND DYKMAN LLP

By: s/Matthew Roseman
Matthew G. Roseman, Esq.
100 Quentin Roosevelt Boulevard
Garden City, NY 11530
(516) 357-3700

Counsel for the Debtor

Exhibit D**Project Category Summary**

Matter No.	Project Category	Hours	Fees
1	Chapter 11 Administration	31.80	\$24,237.50
3	Asset Disposition, Sale or Restructuring	85.30	\$67,100.00
4	Resolution of Creditor Issues	10.00	\$8,078.00
6	Plan and Disclosure Statement	65.50	\$50,901.50
8	Retention of Professionals and Fee Statements	8.90	\$6,940.50
9	Preparation for/Attendance at Court Hearings	24.40	\$19,496.50
12	Motion Practice	9.80	\$5,630.00
13	Travel	8.90	\$3,577.50
14	Operating Reports	3.90	\$2,983.50
	TOTAL	248.50	\$188,945.00

Exhibit E**Professionals Summary**

Name	Title	Department	Admission Year	Rate	Hours Billed	Amount Billed
Matthew Roseman	Partner	Bankruptcy & Creditors' Rights	1989	\$820.00	99.9	\$79,335.00
Bonnie Pollack	Partner	Bankruptcy & Creditors' Rights	1990	\$765.00	109.9	\$83,079.00
Michael Traison	Partner	Bankruptcy & Creditors' Rights	2005	\$730.00	34.7	\$25,331.00
Amanda Tersigni	Associate	Bankruptcy & Creditors' Rights	2019	\$300.00	4.0	\$1,200.00

Exhibit F

Time Records

BIM0400

CULLEN AND DYKMAN LLP

Page 1

BIM Run Date... 8/19/2022
BIM Run #..... 0154333

Billing Information Memo Control Listing

2199 MATTHEW G ROSEMAN

BIM#	CLIENT/ MATTER	SUB DESCRIPTION	BILLING GROUP	Time From/Thru Dates	Cost From/Thru Dates	Unbilled Time	Unbilled Cost
06993370	22373 001 BANKRUPTCY 1	OPERATIONS & ADMINISTRATION	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	24,237.50	.00
06993370	22373 001 BANKRUPTCY 3	ASSET DISPOSITION, SALE OR RESTRUCTURE	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	67,100.00	.00
06993370	22373 001 BANKRUPTCY 4	RESOLUTION OF CREDITOR ISSUES	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	8,078.00	.00
06993370	22373 001 BANKRUPTCY 6	PLAN & DISCLOSURE STATEMENT	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	50,901.50	.00
06993370	22373 001 BANKRUPTCY 8	RETENTION/PROFESSIONAL COMP./FEE	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	6,940.50	.00
06993370	22373 001 BANKRUPTCY 9	PREPARATION/ATTEND COURT HEARING	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	19,496.50	.00
06993370	22373 001 BANKRUPTCY 11	DISBURSEMENTS	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	.00	2,629.88
06993370	22373 001 BANKRUPTCY 12	MOTION PRACTICE	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	5,630.00	.00
06993370	22373 001 BANKRUPTCY 13	TRAVEL	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	3,577.50	.00
06993370	22373 001 BANKRUPTCY 14	OPERATING REPORTS	MGR	2/23/2022 8/12/2022	2/23/2022 8/12/2022	2,983.50	.00

Attorney Totals No. of BIMs: 1
No. of MATTERS: 10

Dollars:

188,945.00

2,629.88

CULLEN AND DYKMAN LLP

Billing Information Memo Control Listing

2199 MATTHEW G ROSEMAN

BIM Run Date... 8/19/2022
 BIM Run #..... 0154333

BIM#	CLIENT/ MATTER	SUB DESCRIPTION	BILLING GROUP	Time From/Thru Dates	Cost From/Thru Dates	Unbilled Time	Unbilled Cost
Totals		No. of BIMs: No. of MATTERS:				188,945.00	2,629.88

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#:
BIM#: 0154333
Time: 2/23/2022 8/12/2022
Cost: 2/23/2022 8/12/2022

Requ Attorney.. 2199 MATTHEW G ROSEMAN
N Orig Attorney 9130 MICHAEL H TRAISSON
N Bill Attorney 2199 MATTHEW G ROSEMAN
N Resp Attorney 2199 MATTHEW G ROSEMAN
N Rept Attorney 999 MISCELLANEOUS ATTORNEY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
1 OPERATIONS & ADMINISTRATION
Opened Date.... 9/28/2021

BANKRUPTCY

MONTAUK CLIFFS, LLC et al

Date	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
2/23/2022	BLP			BANKRU	Revisions to petition and schedules and finalize and file same	1.00	765.00		200851 45
2/23/2022	MGR			BANKRU	Review and provide comments to petition and disclosure of attorney compensation and execute same	.70	574.00		200919 138
2/23/2022	MGR			BANKRU	Phone conference and email w/ J Stern, counsel in state court action regarding bankruptcy filing and contact information for referee	.30	246.00		212319 44
2/23/2022	MHT			CHAP11	Telephone call from client regarding full disclosures regarding third-party and preparing for filing of case to enhance return to secured lender.	.60	438.00		201370 3
2/23/2022	MHT			CHAP11	Prepare for and attend strategy conference call re filing of case with client to provide guidance.	.80	584.00		201370 5
2/24/2022	BLP			BANKRU	Discussion with client re chapter 11 process, strategy	.60	459.00		200851 53
2/24/2022	MGR			BANKRU	Phone conf w/ client regarding fiduciary duties and obligations to debtors estate	.30	246.00		200919 150
2/24/2022	MGR			BANKRU	Conf call w/ E Wilner, B Pollack and M Traison regarding division of issues and obligations of debtor in chapter 11	.50	410.00		201370 23
2/24/2022	MHT			CHAP11	Conference call with client re structure, importance of adhering to rules, process, schedules and overview.	.30	219.00		200837 14
2/24/2022	MHT			CHAP11	Telephone call from Eli Wilner requesting information about filing process and negotiations, sale and retention of agents to sell and explanation of US trustee system.	.30	219.00		212338 1
2/25/2022	BLP			BANKRU	Comms re insurance financing issues (.2); comms with client re information for schedules needed (.3)	.50	382.50		200851 58
2/25/2022	MHT			BANKRU	Follow up to call with counsel for lender and report to client explaining response and working on strategy and preparing for conference call.	.40	292.00		200837 28
2/25/2022	MHT			BANKRU	Clients inquiries re various issues;	.50	365.00		201370 37

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 1 OPERATIONS & ADMINISTRATION BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

===== > T I M E < =====				Billable	Non-Chrg.	Group# /Item#
- Date -	Wkng	Serv	Description	Value		
- Date -	Atty	Code				
2/28/2022	BLP	BANKRU	correspondence from and to client re agreement with lender to facilitate consensual plan going forward.	382.50	200886	840
2/28/2022	BLP	BANKRU	Review communications from UST and send to client (.2); comms with UST re IDI, documents for same (.1); comms with client re bank accounts, reporting requirements (.2)	459.00	200886	847
2/28/2022	BLP	BANKRU	Discussions and emails with client and M. Traison re schedules, MORs, accountant retention	918.00	200886	850
2/28/2022	BLP	BANKRU	Review questionnaire and preparation of schedules/SOFA	153.00	200886	855
3/01/2022	BLP	BANKRU	Finalize 1007 affidavit and send to client for execution	765.00	201237	1
3/01/2022	BLP	BANKRU	Prepare schedules and statement of financial affairs	459.00	201237	3
3/01/2022	BLP	BANKRU	Discussions with client re insurance and tax payments (.3); conferences with M. Roseman re insurance questions (.3)	153.00	201237	4
3/01/2022	BLP	BANKRU	Comms with client re bank accounts, transfer of money, etc.	153.00	201237	7
3/01/2022	BLP	BANKRU	Comms with UST re IDI	153.00	201237	9
3/01/2022	BLP	BANKRU	Discussion with insurance counsel re policies, timing of payments, motion	382.50	201237	10
3/01/2022	BLP	BANKRU	Several comms with client and M. Traison re insurance issues, financing, DIP obligations	306.00	203813	3
3/01/2022	BLP	BANKRU	Comms with client re 1007 affidavit and revise document accordingly	219.00	201025	480
3/01/2022	MHT	BANKRU	Call from client seeking assistance completing affidavit for Chapter 11 and discussion of several questions.	146.00	201025	481
3/01/2022	MHT	BANKRU	Review issues raised and prepare written response to inquiries from Wilner.	73.00	201025	482
3/01/2022	MHT	BANKRU	Call from Wilner following up on advice and seeking to address additional issues.	73.00	201025	483
3/01/2022	MHT	BANKRU	Address insurance issues and advice to client re requirement to insure property.	73.00	201025	490
3/01/2022	MHT	BANKRU	Correspondence to client with guidance regarding insurance coverage issues and acquire information to confirm with counsel for insurance company.	73.00	203813	11
3/01/2022	MHT	BANKRU	Correspondence from client and corresponding regarding insurance company and preserving insurance coverage on debtors assets.	306.00	201240	13
3/02/2022	BLP	BANKRU	File schedules and 1007 affidavit (.2); emails with client re IDI (.2);			

BIM300S

CULLEN AND DYKMAN LLP

Page 3

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 1 OPERATIONS & ADMINISTRATION BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

- Date -	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group#	/Item#
3/02/2022	BLP			BANKRU	Review comms from UST re IDI and emails with client re same (.2); discussion with client re BOA account, insurance certificates, DIP account (.2)	.40	306.00		201240	14
3/02/2022	BLP			BANKRU	Discussions with insurance counsel re motion, payments, timing of this month's payments (.2); email to client re call and timing of payments (.1)	.30	229.50		201240	17
3/02/2022	BLP			BANKRU	Several comms with cleat re IDI documents and DIP account (.4); comms with UST re retention motion (.1)	.50	382.50		201240	20
3/03/2022	BLP			BANKRU	Comms re various case administrative matters (.4); review and respond to emails re IDI and documents (.2)	.60	459.00		201238	2
3/03/2022	BLP			BANKRU	Emails re DIP accounts (.1); discussion with UST re case, plan (.2); emails with UST re insurance certifications, DIP accounts (.2); emails re 341 meeting pre-call with UST (.1)	.60	459.00		201238	3
3/04/2022	BLP			BANKRU	Comms re insurance documents requested by UST	.20	153.00		201238	14
3/04/2022	MHT			BANKRU	Telephone call from Eli Wilner with questions regarding interview process, real estate brokerage issues and meetings with U.S. Trustee's Office first meeting of creditors and review procedures.	.40	292.00		201301	1
3/04/2022	MHT			BANKRU	Follow up correspondence to Eli Wilner regarding Montauk Cliff's bankruptcy, confirming real estate sales processes.	.20	146.00		201301	2
3/10/2022	BLP			BANKRU	Emails with client re insurance payments	.20	153.00		202561	40
3/10/2022	MHT			BANKRU	Correspondence to and from client regarding insurance payment obligations.	.20	146.00		201601	13
3/10/2022	MHT			BANKRU	Letter to client questioning regarding coordination of communications and negotiations and special rules at work regarding the bankruptcy process.	.10	73.00		201601	14
3/11/2022	BLP			BANKRU	Discussion with client re IDI and MORs and follow up emails with client re same	.50	382.50		202561	58
3/11/2022	MHT			BANKRU	Call from Mr. Wilner regarding sales and confirming plan and discussion regarding meeting with trustee and other formal bankruptcy procedures requiring explanation.	.40	292.00		201827	7
3/14/2022	BLP			BANKRU	Attend IDI	.50	382.50		202562	2
3/15/2022	BLP			BANKRU	Emails with UST re tax returns, identification (.1); emails with client re DIP checks (.2)	.30	229.50		202563	10
3/15/2022	MHT			BANKRU	Call from client requesting counseling and	.80	584.00		203813	73

BIM300S

CULLEN AND DYKMAN LLP

Page 4

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

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 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

Date	Atty	Subm	Serv	Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/16/2022	BLP		BANKRU		discussing alternative remedies and strategies and providing explanation of system.	.40	306.00		202564 21
3/21/2022	BLP		BANKRU		Emails with client re retention papers, DIP checks (.2); discussion with client re various administrative issues in case (.2)	.30	229.50		202575 26
3/21/2022	BLP		BANKRU		Send all filed plan documents to lender (.1); emails with client re 341 prep logistics (.1)	.70	535.50		202575 32
3/21/2022	MHT		BANKRU		vaccination status to court prior to then (.1) Prepare client for 341 meeting	.30	219.00		203813 103
3/23/2022	BLP		BANKRU		Preparation meeting with client and review 341 meeting process and disclosures.	.50	382.50		202575 52
3/23/2022	BLP		BANKRU		Comms with client re tax returns requested by IRS, status of same (.2); emails with IRS re same (.2); emails with lender re return mail and updated address (.1)	.50	382.50		202575 58
3/23/2022	BLP		BANKRU		Attend 341 meeting	.20	153.00		202575 60
3/24/2022	MHT		BANKRU		Discussion with client after 341 meeting re same Telephone call from client to discuss status, review 341 meeting, discuss next steps.	.20	146.00		203813 115
3/25/2022	BLP		BANKRU		Email to IRS re requested tax returns (.2); discussion with M. Traisson re case status (.2)	.40	306.00		202567 49
3/28/2022	BLP		BANKRU		Emails with court and client re notice of adjournment, incorrect, original hearing date stands	.20	153.00		202614 28
3/30/2022	BLP		BANKRU		Emails with court regarding change of addresses on matrix	.20	153.00		202735 9
3/31/2022	BLP		BANKRU		Conferences with M. Roseman re discussions with brokers and lender re negotiating terms of deal (.2); review and file notice of address change (.2)	.40	306.00		202785 229
3/31/2022	MGR		BANKRU		Phone conf w/ J Stern regarding case status	.20	164.00		202792 1326
4/01/2022	MGR		BANKRU		Phone conf w/ E Wilner regarding initial case conference and what to expect	.30	246.00		205091 1
4/04/2022	BLP		BANKRU		Prepare and file notice of change of addresses	.40	306.00		203102 3
4/04/2022	BLP		BANKRU		Conference with M. Roseman re outcome of conference, status with lender discussions re broker, etc. (.2); prepare and file CNO for insurance motion (.3)	.50	382.50		203102 4
4/04/2022	BLP		BANKRU		Email to UST re change of address for communications	.10	76.50		212319 5
4/13/2022	MHT		BANKRU		Conference call with client manager Mr. Wilner regarding case	.50	365.00		205101 1
4/14/2022	MHT		BANKRU		Inquiries from Mr. Wilner, questions and advice	1.00	730.00		205091 27

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 1 OPERATIONS & ADMINISTRATION BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

- Date -	Wkng Atty	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
4/19/2022	BLP	BANKRU	regarding plan of reorganization and sale of assets. (Total time 3.5 hours less courtesy reduction of 2.5 hours for a net of 1.0 hours)	.20	153.00		9
4/21/2022	BLP	BANKRU	Emails re evidence of closure of pre-petition accounts	.40	306.00		37
4/26/2022	BLP	BANKRU	Further emails re account closure (.2); emails re income tax pass throughs (.2)	.20	153.00		14
4/27/2022	BLP	BANKRU	Emails with client re attempting to get letter from bank re closure of pre petition account	.20	153.00		11
5/03/2022	BLP	BANKRU	Comms with UST re closed accounts	.20	153.00		10
5/04/2022	BLP	BANKRU	Emails re adjournment of status conference	.40	306.00		11
5/17/2022	MGR	BANKRU	Prepare and file notice of adjournment of status conference	.20	164.00		114
5/25/2022	BLP	BANKRU	E-mails regarding status of case	.30	229.50		36
5/25/2022	MGR	BANKRU	Comms with court and lender re court adjournment of confirmation hearing and time sensitivity issues	.30	246.00		38
5/27/2022	BLP	BANKRU	Review email from chambers adjourning confirmation hearing until August, discuss response w/ B Pollack	.20	153.00		30
5/31/2022	BLP	BANKRU	Comms with chambers re confirmation hearing date	.30	229.50		943
6/21/2022	BLP	BANKRU	Comms with chambers trying to ascertain when confirmation hearing will occur (.2); comms with debtor re same (.1)	.20	153.00		4
7/28/2022	MGR	BANKRU	Emails with client re insurance payments and questions re email received	.30	246.00		1
8/02/2022	BLP	BANKRU	Phone conf w/ J Stern of Weber Law Group regarding case status and mechanics of carve out Letter to court with all documents for confirmation and emails to UST and lender with same	.40	306.00		9
8/04/2022	MGR	BANKRU	E-mail chambers regarding appearance for confirmation hearing and review covid rules for appearance	.30	246.00		23
8/11/2022	BLP	BANKRU	Several comms with lender re hearing on sale, UST fees under plan, other sale issues	.50	382.50		22
Unbilled Professional Services				31.80 **	24,237.50	**	.00 **

=====> No costs advanced recorded for this matter through 08/12/2022

BIM300S

CULLEN AND DYKMAN LLP

Page 6

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
 1 OPERATIONS & ADMINISTRATION
 Opened Date.... 9/28/2021

DEMAND
 XC001

RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

BANKRUPTCY

T I M E

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

B I L L I N G S U M M A R Y

Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	20.50	765.00	15,682.50
MATTHEW G ROSEMAN	PARTNER	MGR	2199	3.40	820.00	2,788.00
MICHAEL H TRAISSON	PARTNER	MHT	9130	7.90	730.00	5,767.00
Unbilled Time				31.80		24,237.50
Unbilled Costs Advanced						.00
Total Unbilled Time & Costs Advanced						24,237.50
Outstanding	Before	Value	After	Value		
Unbilled Time	2/23/2022	.00	8/12/2022	153.00		
Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00		

=====> No Accounts Receivable balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

Page 7

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
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22373 001 BANKRUPTCY
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 DEMAND
 XC001

RUN#: 0154333
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 BANKRUPTCY

M A T T E R S U M M A R Y

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M A T T E R S U M M A R Y

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Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date	Last Time Rept.	8/13/2022
Tim Dollars Rpt	24,390.50	24,390.50	Cost Dollar Rpt	.00	.00	Last Time Rept.	0/00/0000
Total Unbilled	.00	.00	Total Unbilled	.00	.00	Last Bill Date.	0/00/0000
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00	Last Receipts..	0/00/0000
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00	Bill Thru Date.	0
Time Receipts..	.00	.00	Costs Receipts.	.00	.00	Bill Time Bdgt.	0
Outstanding A/R	.00	.00	Outstanding A/R	.00	.00	Bill Cost Bdgt.	0
Realization....	.00	.00	Realization....	.00	.00	A/R Credit Lmt.	0
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00	Credit Limit...	0
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00		

BTM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Regu Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 3 ASSET DISPOSITION, SALE OR RESTRUCTURE BIM#: 06993370
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 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY XC001 BANKRUPTCY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

MONTAUK CLIFFS, LLC et al

Date	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
2/23/2022	MGR			BANKRU	Receipt and review of title report for 42 Old Montauk Highway	.30	246.00		200919 140
2/23/2022	MGR			BANKRU	Emails to Goodman Marks with additional information regarding property	.30	246.00		200919 141
2/23/2022	MGR			BANKRU	Phone conf w/ M Guzowski of Goodman Marks regarding status of updated appraisal of the property	.20	164.00		201370 19
2/23/2022	MHT			CHAP11	Conference call with broker Tanya Hamilton re sales and maximize return \$40,000,000.00 or more.	.20	146.00		201370 7
2/23/2022	MHT			CHAP11	Telephone call with broker and follow up and correspondence from broker regarding maximizing return to secured lender on sale of real estate and how to get most of his debt paid.	.30	219.00		201370 9
2/24/2022	MGR			BANKRU	Phone conf w/ M Hagani regarding retention of Paramount Realty	.30	246.00		200919 147
2/24/2022	MGR			BANKRU	Conf call w/ Hedgerow RE brokers regarding business plan and marketing strategy	.70	574.00		200919 148
2/24/2022	MGR			BANKRU	E-mails w/ client regarding retention of real estate professionals	.30	246.00		200919 151
2/24/2022	MHT			CHAP11	Conference call interview of brokerage firm and review of process and proposed strategy.	.30	219.00		201370 27
2/24/2022	MHT			CHAP11	Follow up summary call with client regarding results of interview and considerations.	.20	146.00		201370 29
2/25/2022	MGR			BANKRU	Phone conf w/ J Hubbard of A & G and emails w/ Keen Summit regarding contemplated sales process	.20	164.00		200919 159
2/25/2022	MHT			BANKRU	Call from Wilner with questions re Dale's process, offers, how it's handled and referring inquiries to counsel re 22 million to 42 million dollars.	.30	219.00		201370 31
2/25/2022	MHT			BANKRU	Call with Wilner regarding cooperation with lender, follow up on lenders counsels suggestion to work together, also discussing case administration, timing issues and sales broker retention.	.70	511.00		201370 33
2/25/2022	MHT			BANKRU	Correspondence from client regarding Appraiser timely response and plans for submitting to	.10	73.00		201370 35

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 3 ASSET DISPOSITION, SALE OR RESTRUCTURE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

===== > T I M E <=====									
- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#		
2/28/2022	BLP	BANKRU	court.						
2/28/2022	MGR	BANKRU	Review appraisal and comms re same	.30	229.50		200886	897	
		BANKRU	Review draft appraisal and email Goodman Marks regarding same	.60	492.00		200919	172	
2/28/2022	MHT	BANKRU	Receipt and review of appraisal and consideration of next steps.	.20	146.00		201370	45	
3/01/2022	MGR	BANKRU	E-mail w/ C Lynch regarding real estate broker retention and brokers to be considered	.30	246.00		202792	1009	
3/02/2022	MGR	BANKRU	E-mails w/ J Tusso regarding the broker interview process and form of invite for broker presentation	.50	410.00		203813	167	
3/02/2022	MGR	BANKRU	Phone conf w/ M Hagani of paramount realty regarding broker selection process and call w/ lender	.40	328.00		203813	169	
3/02/2022	MHT	BANKRU	Telephone call from client and discussion of realtors and brokerage proposal, bidding process.	.30	219.00		203813	233	
3/02/2022	MHT	BANKRU	Correspondence from brokerage firm submitting proposal for sale.	.20	146.00		203813	255	
3/03/2022	MGR	BANKRU	E-mails w/ Hedgerow brokers regarding scheduling interview with lender regarding asset disposition	.30	246.00		202792	80	
3/03/2022	MGR	BANKRU	E-rail and phone conf w/ M Hagani of Paramount regarding sales process	.40	328.00		202792	81	
3/03/2022	MHT	BANKRU	Telephone conference call from client regarding process of interviewing brokerage firms and importance of moving forward with process of marketing property.	.90	657.00		203813	27	
3/03/2022	MHT	BANKRU	Work on securing real estate brokerage and correspondence for a Berkshire Hathaway Cardiacdy.	.10	73.00		203813	299	
3/04/2022	MGR	BANKRU	E-mails w/ brokers from Sotheby's regarding scheduling of interview	.30	246.00		202792	126	
3/04/2022	MGR	BANKRU	Conf calls w/ client regarding interview process and opinion regarding broker selection	.50	410.00		202792	127	
3/04/2022	MGR	BANKRU	Interview of Bespoke brokerage concerning sale of residence	.60	492.00		202792	128	
3/04/2022	MGR	BANKRU	Interview of Paramount Realty regarding sale of residence	.40	328.00		202792	129	
3/04/2022	MGR	BANKRU	Interview of Sotheby s regarding sale of residence	.50	410.00		202792	130	
3/04/2022	MGR	BANKRU	Interview with Hedgerow brokers regarding sale of residence	.60	492.00		202792	131	
3/04/2022	MHT	BANKRU	All afternoon with client interviewing and evaluation of sales agents and realtors and counseling client re selection and timing issues	2.80	2,044.00		203813	31	

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

22373 001 BANKRUPTCY
 3 ASSET DISPOSITION, SALE OR RESTRUCTURE
 Opened Date.... 9/28/2021
 DEMAND
 XC001
 MISCELLANEOUS ATTORNEY
 MISCELLANEOUS ATTORNEY
 BANKRUPTCY

===== > T I M E < =====				=====			
- Date -	Wkng Atty	Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg. Group# /Item#
3/06/2022	BLP		BANKRU	Draft bid procedures	.90	688.50	201277 6
3/07/2022	MGR		BANKRU	Conf call w/ Client and M Traison regarding broker selection process and choices	.30	246.00	202792 184
3/07/2022	MGR		BANKRU	E-mails with Case Montauk counsel regarding selection of broker	.20	164.00	202792 185
3/07/2022	MGR		BANKRU	Review Bespoke proposal and email Bespoke team regarding same	.30	246.00	202792 186
3/07/2022	MGR		BANKRU	Initial review of draft terms of sale	.30	246.00	202792 187
3/07/2022	MHT		BANKRU	Correspondence from client and message from client regarding sales activity.	.20	146.00	203813 33
3/07/2022	MHT		BANKRU	Review Realtor proposal and correspondence from broker.	.10	73.00	203813 35
3/07/2022	MHT		BANKRU	Discussion with client regarding choice of broker and strategy. (Actual time .4 less courtesy reduction of .1).	.30	219.00	203813 37
3/08/2022	MGR		BANKRU	Phone conf w/ J Tusso regarding selection of brokers	.30	246.00	202792 222
3/08/2022	MGR		BANKRU	Status emails to broker candidates	.20	164.00	202792 223
3/10/2022	BLP		BANKRU	Emails with client and M. Roseman re issues with broker, timing of retention	.20	153.00	202561 41
3/10/2022	MGR		BANKRU	E-mails w/ J Tusso and client regarding selection of brokers and issues concerning Hedgerow and Bespoke.	.60	492.00	202792 320
3/10/2022	MGR		BANKRU	E-mail to Hedgerow requesting information and listing agreement	.20	164.00	202792 323
3/10/2022	MGR		BANKRU	Follow up email and phone conf w/ E Wilner regarding selection of broker	.30	246.00	202792 324
3/10/2022	MGR		BANKRU	E-mails w/ Client and Hedgerow regarding retention and staging issues	.30	246.00	202792 329
3/10/2022	MHT		BANKRU	Review of letter from lender counsel and extensive discussion regarding selection of brokerage and proposal for moving forward.	.20	146.00	203813 41
3/10/2022	MHT		BANKRU	Call from Wilner raising issues re proposed opening price, conditions imposed, date of vacating, and instructions re negotiations.	.20	146.00	203813 45
3/10/2022	MHT		BANKRU	Correspondence from client regarding his due diligence regarding broker services.	.10	73.00	203813 47
3/10/2022	MHT		BANKRU	Meeting with client and then with counsel telephonically regarding lender proposal and consultation re sale of real estate.	1.10	803.00	203813 49
3/10/2022	MHT		BANKRU	Multiple follow up correspondence regarding DIP strategy to enhance marketing success.	.20	146.00	203813 51

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 3 ASSET DISPOSITION, SALE OR RESTRUCTURE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

- Date -	Wkng	Atty	Subm	Serv	Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/10/2022	MHT			BANKRU		Call from client representative regarding retention of broker issue, strategy, and preferences, with request to approach lender with proposal and counsel to client to create bullet point list.	.20	146.00		203813 53
3/10/2022	MHT			BANKRU		Correspondence from and to Mr. Wilner regarding staging a property to attract buyers.	.20	146.00		203813 55
3/11/2022	MGR			BANKRU		Review and provide comments to sales motion	.60	492.00		202792 360
3/11/2022	MGR			BANKRU		Review brokerage agreement and discuss w/ E Wilner	.40	328.00		203813 171
3/11/2022	MGR			BANKRU		E-mail to Hedgerow regarding form of brokers agreement	.30	246.00		203813 173
3/11/2022	MHT			BANKRU		Correspondence from Mr. Wilner with Hedgerow agreement.	.20	146.00		203813 57
3/11/2022	MHT			BANKRU		Correspondence from Mr. Wilner re opening offer price.	.20	146.00		203813 59
3/11/2022	MHT			BANKRU		Follow up call regarding real estate sale with counsel.	.10	73.00		203813 61
3/12/2022	BLP			BANKRU		Draft sale motion	3.50	2,677.50		202191 17
3/13/2022	BLP			BANKRU		Discussion with M. Roseman re status of sale issues, plan	.20	153.00		203813 63
3/13/2022	MGR			BANKRU		E-mail exchange w/ J Tuso regarding status of comments to plan and site visit to Montauk property	.40	328.00		202792 418
3/14/2022	MGR			BANKRU		E-mails w/ J Tuso regarding site visit and need to be vaccinated and masked	.30	246.00		202792 414
3/14/2022	MGR			BANKRU		Conf call w/ Client and M Traison regarding sales process and issues regarding status of case	.50	410.00		202792 416
3/14/2022	MGR			BANKRU		Conf call w/ Hedgerow brokers team regarding marketing plan	.50	410.00		203813 175
3/14/2022	MHT			BANKRU		Correspondence regarding strategy to enhance return on sale.	.10	73.00		203813 65
3/14/2022	MHT			BANKRU		Conference call with client and address issues of foreclosure and chapter 11 proceedings and discussion regarding negotiations with Realtor on listing prices and negotiations with lender regarding terms of the plan of liquidation.	.60	438.00		203813 67
3/15/2022	BLP			BANKRU		Draft sale motion	1.80	1,377.00		202563 4
3/15/2022	BLP			BANKRU		Discussion with C. Lynch re sales process, no need for motion, etc.	.20	153.00		202563 5
3/15/2022	MGR			BANKRU		Phone conf w/ Broker team regarding sales process	.40	328.00		202792 422
3/15/2022	MGR			BANKRU		Conf call w/ Client and M Traison regarding sales process	.40	328.00		202792 423
3/15/2022	MHT			BANKRU		Multiple correspondence and calls with client regarding sale procedure (actual time of 1.0	.20	146.00		203813 71

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#:

0154333

BIM#:

06993370

Time:

2/23/2022

Cost:

2/23/2022

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
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 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY

3

ASSET DISPOSITION, SALE OR RESTRUCTURE

Opened Date.... 9/28/2021

DEMAND

XC001

BANKRUPTCY

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T I M E

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- Date -	Wkng Atty	Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group#	/Item#
3/15/2022	MHT		BANKRU	Conference call with client re settling disputes, reduced by .80).	.30	219.00		203813	75
3/16/2022	BLP		BANKRU	terms of sale offerings, revised documents.	2.10	1,606.50		202564	27
3/16/2022	MGR		BANKRU	Prepare broker retention papers	.40	328.00		202792	587
3/16/2022	MGR		BANKRU	Phone confs w/ Preston Kaye regarding access to property and issues regarding marketing	.40	328.00		202792	590
3/16/2022	MGR		BANKRU	Phone conf w/ J Hubbard of A & G Realty regarding status of case and potential role in same	.50	410.00		203813	131
3/16/2022	MHT		BANKRU	3 phone confs w/ E. Wilner regarding broker access and staging of property	.20	146.00		203813	83
3/17/2022	BLP		BANKRU	Call with client re real estate and cooperation.	.40	306.00		202567	32
3/17/2022	MGR		BANKRU	Review comments to broker motion and emails re same	.50	410.00		202792	580
3/17/2022	MGR		BANKRU	Phone conf w/ J Tusso regarding inspection of premises and retention of brokers and possible use of A & G Realty as auctioneers	1.00	820.00		203813	133
3/17/2022	MHT		BANKRU	Prepare for and participate in Conf call with client, C Rennert and M Traison regarding site visit and sales process	.20	146.00		203813	85
3/17/2022	MHT		BANKRU	Report from broker and details re marketing examine and consider same.	.30	219.00		203813	87
3/17/2022	MHT		BANKRU	Call from debtor and discussion points and response of debtor re realtor proposals, counseling and guidance re maximizing realization from sale.	.20	146.00		203813	89
3/17/2022	MHT		BANKRU	Review final draft of retention agreement regarding real estate broker Hedgerow.	.20	146.00		203813	91
3/17/2022	MHT		BANKRU	Correspondence to Debtor regarding application for retention of broker and information regarding process.	.50	365.00		203813	93
3/17/2022	MHT		BANKRU	Call from debtor re Hedgerow, lender and communications, negotiations with lender and with realty, assisting with moving process forward.	.30	219.00		203813	97
3/18/2022	BLP		BANKRU	Prepare for and participate in conference call with Mr. Wilner and counsel regarding disposition of property and satisfaction of lenders claims.	.20	153.00		202191	7
3/18/2022	MGR		BANKRU	Discussion with M. Roseman re broker visit, status of broker retention, etc.	2.50	2,050.00		203813	135
3/21/2022	MHT		BANKRU	Meeting with client and then meeting lender representative and client regarding inspection of property	.20	146.00		203813	105
3/21/2022	MHT		BANKRU	Call from Mr. Wilner regarding broker and listing and promoting sale of property.	.70	511.00		203813	107
3/21/2022	MHT		BANKRU	Correspondence from and to client regarding					

CULLEN AND DYKMAN LLP

BIM300S

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22373 001 BANKRUPTCY
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 Opened Date.... 9/28/2021

BANKRUPTCY

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DEMAND
 XC001

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T I M E

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- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/22/2022	BLP	BANKRU	broker relations and call with consultant regarding staging and virtual showings and transmit advice to debtors manager. Actual time 1.5 hours less courtesy reduction of .8 for net of .7)	1.40	1,071.00		202575 44
3/22/2022	BLP	BANKRU	Several communications with M. Roseman, J. Tuso and C. Lynch re status of broker retention issues, plan provision re marketing period	.60	459.00		202575 48
3/22/2022	MGR	BANKRU	Review lender comments to broker motion and discussions with C. Lynch and M. Roseman re same	.50	410.00		203813 145
3/22/2022	MGR	BANKRU	Phone conf w/ E Wilner regarding issues concerning retention of brokers and timing	.80	656.00		203813 147
3/22/2022	MHT	C/FCL	Review proposed comments to retention application and discuss conflict with plan and resolutions w/ B Pollack	.20	146.00		203813 109
3/23/2022	MGR	BANKRU	Correspondence from debtor and response and additional correspondence regarding strategy implementation for marketing of assets.	.60	492.00		202792 1440
3/25/2022	MGR	BANKRU	Phone conf w/ Client regarding sales process and open issues	.40	328.00		202792 695
3/25/2022	MGR	BANKRU	Review emails from broker outlining staging proposal and emails w/ client regarding same	.80	656.00		203813 137
3/25/2022	MHT	BANKRU	Conf call w/ Brokers and counsel J Tuso regarding staging, pricing and timing of sale	.50	365.00		203813 117
3/27/2022	MGR	BANKRU	Multiple calls and correspondence and conference calls discussing strategy, reviewing real estate transaction, advising regarding strategy and possible alternatives. (Actual time 2.5 less courtesy adjustment reduction of 2.0)	.50	410.00		202792 999
3/27/2022	MHT	BANKRU	Prepare for and participate in conf call with client regarding staging email from Preston Kaye, Hedgerow broker	.50	365.00		203813 119
3/28/2022	MGR	BANKRU	Correspondence and conference calls guiding client regarding procedures and alternatives and listening to instructions regarding approach. (Actual time 1.5 less courtesy reduction of 1.0)	.20	164.00		202792 998
3/28/2022	MHT	BANKRU	Review staging recommendations and email J Tuso regarding same	.30	219.00		203813 121
3/29/2022	BLP	BANKRU	Correspondence to and correspondence from client re hearings and attention to work on selling real estate.	.20	153.00		203813 123
3/29/2022	MGR	BANKRU	Discussion with M. Roseman re broker, plan status Phone conf w/ J Tuso regarding substitution of brokers and email client regarding conversation	.50	410.00		202792 1061

BTM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

 RUN#:
 BIM#: 0154333
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

 22373 001 BANKRUPTCY
 3 ASSET DISPOSITION, SALE OR RESTRUCTURE
 Opened Date.... 9/28/2021
 DEMAND
 XC001
 BANKRUPTCY

===== > T I M E < =====							
- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/30/2022	MGR	BANKRU	Phone conf w/ J Tusso attorney for Case Montauk regarding choice of broker and sales process;Email to client regarding same	.50	410.00		202792 1166
3/30/2022	MHT	BANKRU	Attention to response regarding a realtor and advise client.	.20	146.00		203813 125
3/31/2022	MGR	BANKRU	Phone conf w/ Hedgerow team and follow up email regarding agreement to staging	.50	410.00		202792 1319
3/31/2022	MGR	BANKRU	Review and respond to email from client regarding sales process	.30	246.00		202792 1325
3/31/2022	MGR	BANKRU	Phone conf w/ E. Wilner regarding conversations concerning brokers and staging as well as open issues w/ Case Montauk	.60	492.00		203813 139
3/31/2022	MGR	BANKRU	Conf call w/ M Traison and E Wilner regarding sales process and issues involving broker retention	.60	492.00		203813 149
3/31/2022	MGR	BANKRU	Phone conf w/J Tusso regarding broker issue	.30	246.00		203813 151
3/31/2022	MGR	BANKRU	Phone conf w/ E Wilner regarding potential sales timing	.30	246.00		203813 153
3/31/2022	MHT	BANKRU	Attention to debtor strategy and engagement with sale of lender's collateral w/ multiple conference calls and communications with debtors responsible person and follow up. (Actual time 1.9 hours less courtesy adjustment of one hour for a net of .90)	.90	657.00		203813 127
4/01/2022	MGR	BANKRU	Review emails from client regarding potential use of Heritage Auctioneers and discuss same w/ client	.50	410.00		204838 397
4/01/2022	MGR	BANKRU	E-mails w/ J Tusso regarding potential use of auctioneer in conjunction with broker	.40	328.00		204838 398
4/04/2022	BLP	BANKRU	Review lender changes to broker agreement	.20	153.00		203102 6
4/04/2022	MGR	BANKRU	Emails w/ J Tusso regarding comments to the sales agreement w/ Hedgerow	.60	492.00		204838 138
4/04/2022	MGR	BANKRU	Phone conf w/ client regarding comments to sales agreement and sales process	.40	328.00		204838 139
4/05/2022	MGR	BANKRU	Phone conf w/ client regarding status of sales process negotiations	.30	246.00		204838 399
4/06/2022	MGR	BANKRU	Phone conf w/ J Tusso regarding status of comments to broker agreement and sale timing	.30	246.00		205091 31
4/07/2022	MGR	BANKRU	Review comments from J Tusso regarding brokerage agreement and email clarification questions	.40	328.00		205091 61
4/08/2022	MGR	BANKRU	E-mails w/ Broker and client regarding terms retention and fees	.50	410.00		205091 63
4/08/2022	MHT	BANKRU	Review brokerage agreement and prepare comments.	.20	146.00		205091 11
4/10/2022	BLP	BANKRU	Several emails with M. Roseman and M. Traison re	.40	306.00		205101 15

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 3 ASSET DISPOSITION, SALE OR RESTRUCTURE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY XC001 BANKRUPTCY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

- Date -	Wkng	Atty	Subm	Serv	Code	Description	Hours	Billable Value	Non-Chrg.	Group#	/Item#
4/11/2022	BLP			BANKRU		timing of sale process in new version of plan, concerns	.40	306.00		205101	17
4/11/2022	MGR			BANKRU		Conferences with M. Roseman re plan issues re sale, vacating premises	.40	328.00		205101	23
4/11/2022	MHT			BANKRU		Review proposed changes to brokerage agreement and confirm that changes acceptable to secured creditor	.70	511.00		205091	13
4/12/2022	MGR			BANKRU		Call from Mr. Wilner and review of terms of brokerage agreement and aspects of sale process. Review and respond to emails from M Traison regarding status of negotiations and timing of client moving	.40	328.00		205091	35
4/12/2022	MGR			BANKRU		Phone conf w/ J Tuso regarding timing issues	.30	246.00		205091	43
4/12/2022	MHT			BANKRU		Multiple correspondence to and from debtor regarding negotiations and regarding sale of real estate and terms and explanations.	.70	511.00		205091	17
4/12/2022	MHT			BANKRU		Call from Mr. Wilner regarding strategies and sale of real estate for highest best price.	.40	292.00		205091	19
4/13/2022	MGR			BANKRU		Phone conf and emails regarding sales process and timing of call to bids w/ client	.50	410.00		205091	67
4/14/2022	BLP			BANKRU		Conferences with M. Roseman and M. Traison re status of negotiations of timing on brokerage issues for plan	.40	306.00		203876	31
4/14/2022	MGR			BANKRU		Phone conf w/ E Wilner regarding sales process and plan issues	.50	410.00		204838	128
4/14/2022	MGR			BANKRU		E-mail and follow up voicemail to J Tuso regarding counter proposal and 8/15 vacate date	.40	328.00		205091	37
4/15/2022	MGR			BANKRU		Phone conf and series of emails w/ J Tuso regarding finalizing settlement and earliest possible closing date	1.00	820.00		205091	39
4/15/2022	MGR			BANKRU		Phone conf w/ E Wilner regarding settlement status and earliest possible closing date	.50	410.00		205091	41
4/18/2022	BLP			BANKRU		Discussion with client to walk through timing of sale and plan process	.20	153.00		205101	19
4/18/2022	MHT			BANKRU		Multiple correspondence and work on secure acknowledgment and approval of plan for better and attention to retention of brokerage; correspondence to Preston and review of retention papers. (Actual time 1.8 less courtesy reduction of 1.7)	.10	73.00		204122	55
4/19/2022	MHT			BANKRU		Correspondence and request from Getter regarding real estate brokerage and finalization of revised plan. (Actual time 1.1 hours less courtesy adjustment of 1.0 hours for a net of .10)	.10	73.00		204142	7

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

22373 001 BANKRUPTCY
 3 ASSET DISPOSITION, SALE OR RESTRUCTURE
 Opened Date.... 9/28/2021
 BANKRUPTCY

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

DEMAND
 XC001

===== > T I M E < =====				=====			
- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
4/20/2022 MGR		BANKRU	E-mails regarding marketing issues w/ E Wilner	.30	246.00		204838 303
4/20/2022 MHT		BANKRU	Correspondence and conference call with client regarding real estate transaction and marketing strategy.	.20	146.00		204224 166
4/25/2022 MGR		BANKRU	Phone conf w/ client regarding marketing process	.30	246.00		204838 711
4/25/2022 MGR		BANKRU	Phone conf and emails regarding the progress with marketing with P Kaye of Hedgerow	.70	574.00		212319 14
5/02/2022 MGR		BANKRU	Status phone conf w/ broker and debtor regarding sales update	.50	410.00		206707 7
5/13/2022 MGR		BANKRU	Emails with Broker and debtor regarding status of sale process and call for 3/16	.30	246.00		206707 32
5/13/2022 MGR		BANKRU	Review docket regarding objections, if any to broker retention and discuss same with B Pollack	.30	246.00		206987 32
5/16/2022 BLP		BANKRU	Upload order re broker retention with email re presentment, no objections	.20	153.00		206987 36
5/16/2022 MGR		BANKRU	Status call with brokers and client regarding marketing effort	.50	410.00		206707 46
5/20/2022 MGR		BANKRU	Review and respond to emails from broker regarding sales process	.40	328.00		206707 107
5/23/2022 BLP		BANKRU	Comms with chambers re broker order	.10	76.50		206427 14
5/24/2022 MGR		BANKRU	Review order retaining RE broker and email same to broker and client	.30	246.00		206987 34
5/31/2022 MGR		BANKRU	Review marketing report and prepare for call with brokers	.50	410.00		206707 129
5/31/2022 MGR		BANKRU	Conf call with broker team regarding sales process	.30	246.00		206707 130
6/14/2022 MGR		BANKRU	Review and respond to emails from client regarding price adjustment and issues concerning same	.40	328.00		208400 63
6/15/2022 MGR		BANKRU	Review email from client and conf call w/ E Wilner and M Traisson regarding Hedgerow price change and strategic objections to same	.50	410.00		208400 53
6/15/2022 MGR		BANKRU	Phone conf w/ P Kaye of Hedgerow regarding price change and client issue with same	.30	246.00		208400 54
6/15/2022 MGR		BANKRU	Phone conf w E Wilner regarding compromise of price change and related emails regarding same	.40	328.00		208400 55
6/15/2022 MHT		BANKRU	Correspondence from client regarding sales schedule, requesting clarification and responses after additional review of documents outlining sales procedure increments.	.30	219.00		207676 1
6/15/2022 MHT		BANKRU	Conference call requested by client to discuss sales process.	.30	219.00		207676 2
6/27/2022 MGR		BANKRU	Phone conf w/ E Wilner regarding pricing and brokers desire to reduce pricing	.50	410.00		208400 92

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CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 3 ASSET DISPOSITION, SALE OR RESTRUCTURE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

- Date -	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
6/27/2022	MHT			BANKRU	Call from client regarding procedures necessary regarding real estate (.1); exchanges of correspondence regarding administration of estate property (.2).	.30	219.00		208314 31
6/29/2022	MHT			BANKRU	Work on file re sales issues and liquidation of property to prepare presentation per client request.	.50	365.00		208373 66
6/30/2022	MGR			BANKRU	Review and respond to emails from client regarding sales/marketing process and plan language (.3); review plan regarding same (.4)	.70	574.00		208400 125
6/30/2022	MHT			BANKRU	Correspondence from Wilner and report reports negotiations regarding sales process. (Total time 1.0 less courtesy reduction of .80 for net of .20)	.20	146.00		208429 816
7/07/2022	MGR			BANKRU	Phone conf w/ P Kaye from Hedgerow regarding sales process status and email to client regarding same	.50	410.00		210893 123
7/08/2022	MGR			BANKRU	Phone conf w/ client regarding sales process status	.30	246.00		210893 121
7/25/2022	MGR			BANKRU	Phone conf w/ E Wilner regarding sales process and E-mail to Hedgerow regarding same.	.40	328.00		210893 458
7/26/2022	MGR			BANKRU	Conf call with Hedgerow team regarding marketing efforts and call to bid procedures	.30	246.00		210893 493
7/27/2022	MGR			BANKRU	E-mails w/ Broker regarding call to bids	.30	246.00		210893 565
8/02/2022	MGR			BANKRU	Phone conf w/ J Tusso regarding call to bids and direction regarding acceptance of bid or credit bid and need to make an appropriate motion	.40	328.00		212259 5
8/08/2022	MGR			BANKRU	E-mails w/ J Tusso regarding credit bid	.30	246.00		212259 42
8/08/2022	MGR			BANKRU	Review notice from County regarding RE taxes and email same to J Tusso	.30	246.00		212259 46
8/10/2022	BLP			BANKRU	Prepare sale motion and order	2.80	2,142.00		212258 18
8/10/2022	BLP			BANKRU	Comms with lender re go forward issues re sale, closing, etc.	.30	229.50		212258 20
8/10/2022	MGR			BANKRU	Conf call w/ C Lynch and B Pollack regarding sale motion and related issues; Emails concerning same	.50	410.00		212259 34
8/10/2022	MGR			BANKRU	E-mails w/ client regarding RE related issues including sale and vacating date	.40	328.00		212259 35
8/11/2022	BLP			BANKRU	Continued work on sale motion	.80	612.00		212258 21
8/11/2022	MGR			BANKRU	E-mail to client regarding next steps in bankruptcy case	.40	328.00		212259 52
8/11/2022	MGR			BANKRU	Internal confs regarding credit bid and motion to approve and related clsoing/title transfer issues	.70	574.00		212259 53
8/12/2022	BLP			BANKRU	Prepare and file notice of sale hearing	.40	306.00		212258 24

Date 8/19/22 "CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
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N Rept Attorney 999 MISCELLANEOUS ATTORNEY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

- Date -		Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg. Group# /Item#
							85.30 **	67,100.00 **	.00 **

Unbilled Professional Services

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

B I L L I N G S U M M A R Y									
Name	Status	Initials	Number	Hours	Rate	Value			
BONNIE L. POLLACK	PARTNER	BLP	2057	18.20	765.00	13,923.00			.00
MATTHEW G ROSEMAN	PARTNER	MGR	2199	46.60	820.00	38,212.00			.00
MICHAEL H TRAISSON	PARTNER	MHT	9130	20.50	730.00	14,965.00			.00
Unbilled Time						67,100.00			
Unbilled Csts Advanced						.00			
Total Unbilled Time & Costs Advanced						67,100.00			_/_/
Outstanding						Value			
Unbilled Time						Before	Value		
Unbilled Costs Advanced						2/23/2022	574.00		
						2/23/2022	.00		

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CULLEN AND DYKMAN LLP

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8/19/22

Date "CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
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22373 001 BANKRUPTCY
 3 ASSET DISPOSITION, SALE OR RESTRUCTURE
 Opened Date.... 9/28/2021
 DEMAND
 XC001

RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

BANKRUPTCY

===== > B I L L I N G S U M M A R Y <=====

===== > No Accounts Receivable balance for this matter

===== M A T T E R S U M M A R Y <=====

Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date	Last Time Rept.	8/17/2022
Tim Dollars Rpt	67,236.50	67,674.00	Cost Dollar Rpt	.00	.00	Last Cost Rept.	0/00/0000
Total Unbilled		67,674.00	Total Unbilled		.00	Last Bill Date.	0/00/0000
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00	Last Receipts..	
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00	Bill Thru Date.	
Time Receipts..	.00	.00	Costs Receipts.	.00	.00	Bill Time Bdgt.	0
Outstanding A/R	.00%	.00%	Outstanding A/R	.00%	.00%	Bill Cost Bdgt.	0
Realization....	.00	.00	Realization....	.00	.00	A/R Credit Lmt.	0
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00	Credit Limit...	0
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00		

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CULLEN AND DYKMAN LLP

Page 20

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY

RESOLUTION OF CREDITOR ISSUES

Opened Date.... 9/28/2021

DEMAND

XC001

BANKRUPTCY

RUN#:

0154333

BIM#:

06993370

Time:

2/23/2022

Cost:

2/23/2022

MONTAUK CLIFFS, LLC et al

- Date -	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
2/23/2022	BLP			BANKRU	Conference with M. Roseman re stay issues and strategy re lender (.4); prepare letter to referee (.3); send stay letter to lender (.2)	.90	688.50		201370 17
2/23/2022	MGR			BANKRU	Review and respond to emails from J Tusso regarding position of Case Montauk	.30	246.00		200919 134
2/23/2022	MGR			BANKRU	Conf call w/ E Wilner and M Traison regarding counter proposal made by Case Montauk and formulation of response	.70	574.00		200919 135
2/23/2022	MGR			BANKRU	Prepare and revise email in response to J Tusso inquiry as to basis for sale to be held in summer season	.40	328.00		200919 136
2/25/2022	MGR			BANKRU	Phone conf w/ J Tusso attorney for Case Montauk regarding potential resolution to sales process dispute	.40	328.00		200919 156
2/25/2022	MGR			BANKRU	Prepare for and lead conference call with E Wilner and M Traison regarding resolution w/ Case Montauk and downside of non consensual process	.60	492.00		201370 51
2/25/2022	MGR			BANKRU	Review 506 (c) case law	.50	410.00		201370 55
2/28/2022	MGR			BANKRU	E-mails w/ J Tusso regarding resolution of issues with Case Montauk	.20	164.00		200919 177
2/28/2022	MHT			BANKRU	Telephone call from client requesting advice and providing instructions regarding strategy in negotiations.	.20	146.00		201370 39
2/28/2022	MHT			BANKRU	Correspondence to counsel considering clients suggested strategy and follow up.	.20	146.00		201370 41
2/28/2022	MHT			BANKRU	Call to Mr. Wilner to discuss proposal and advisability.	.10	73.00		201370 43
3/01/2022	BLP			BANKRU	Conference with M. Roseman re lender deal terms, plan, sale process (.3); further discussion with M. Roseman and lender counsel re timeline for deal (.2)	.50	382.50		201237 6
3/01/2022	MGR			BANKRU	Prepare for and participate in conf call w/ Case Montauk counsel regarding resolution of open issues to settlement	.70	574.00		202792 1005
3/01/2022	MGR			BANKRU	Review email from J Tusso regarding settlement terms and reply with questions/modifications	.60	492.00		202792 1006

CULLEN AND DYKMAN LLP

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 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
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 Regu Attorney.. 2199 MATTHEW G ROSEMAN
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 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
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 22373 001 BANKRUPTCY
 4 RESOLUTION OF CREDITOR ISSUES
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Date	Wkng	Atty	Subm	Serv	Code	Description	Hours	Billable Value	Non-Chrg.	Group#	Item#
3/01/2022	MGR			BANKRU		Phone conf and e-mail w/ J Stern, appellate counsel regarding bankruptcy stay and appeal	.40	328.00		202792	1008
3/01/2022	MGR			BANKRU		Draft/revise e-mail to client regarding settlement issues	.40	328.00		203813	155
3/02/2022	MGR			BANKRU		Conf call w/ client and M Traison regarding settlement proposal and open issues	.70	574.00		202792	1091
3/02/2022	MGR			BANKRU		E-mails w/ J Tusso regarding resolution of open items cornering settlement of clients positions	.60	492.00		202792	1093
3/23/2022	MGR			BANKRU		E-mails w/ J Tusso regarding issues w/proposed settlement	.30	246.00		202792	1439
3/24/2022	MGR			BANKRU		Conf call with J Tusso, atty for Case Montauk regarding plan issues, broker retention and sales process	1.00	820.00		202792	676
4/11/2022	MGR			BANKRU		Phone conf w/ Debtor and M Traison w/ open issues with lender	.30	246.00		205101	3

Unbilled Professional Services

 10.00 **
 8,078.00 **
 .00 **

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

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Date

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#:	0154333
BIM#:	06993370
Time:	2/23/2022
Cost:	2/23/2022

Requ Attorney..	2199	MATTHEW G ROSEMAN	22373	001	BANKRUPTCY
N Orig Attorney	9130	MICHAEL H TRAISSON	6		PLAN & DISCLOSURE STATEMENT
N Bill Attorney	2199	MATTHEW G ROSEMAN			Opened Date.... 9/28/2021
N Resp Attorney	2199	MATTHEW G ROSEMAN			
N Other Attorney	999	MISCELLANEOUS ATTORNEY	DEMAND		
			XC001		BANKRUPTCY

MONTAUK CLIFFS, LLC et al

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- Date -	Wkng	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/03/2022	BLP	BANKRU	Preparation of plan	2.20	1,683.00		201238 1
3/04/2022	BLP	BANKRU	Continued work on plan and emails with M. Roseman re same	2.30	1,759.50		201238 13
3/04/2022	MGR	BANKRU	Review and provide comments to draft plan of liquidation	1.30	1,066.00		202792 125
3/07/2022	BLP	BANKRU	Revisions to plan	.80	612.00		202561 15
3/07/2022	MGR	BANKRU	Continued review and comments to draft Plan and Outline State court actions and claims for inclusion in disclosure statement	.80	656.00		203813 157
3/08/2022	BLP	BANKRU	Revise plan and draft disclosure statement	2.70	2,065.50		202561 21
3/08/2022	MGR	BANKRU	E-mails with J Tusso and C Lynch regarding timeline for filings	.30	246.00		202792 224
3/08/2022	MGR	BANKRU	Discuss plan structure and method of dealing with hypothetical priority/admin creditors w/ B Pollack	.40	328.00		202792 225
3/08/2022	MGR	BANKRU	Initial review of disclosure statement and revise definition of state court action for plan	.70	574.00		203813 159
3/09/2022	BLP	BANKRU	Revisions to plan and disclosure statement	2.70	2,065.50		202561 34
3/09/2022	MGR	BANKRU	Review and make comments to disclosure statement	.80	656.00		202792 279
3/09/2022	MGR	BANKRU	Review and respond to question from client concerning plan and disclosure statement	.40	328.00		202792 281
3/09/2022	MGR	BANKRU	Final review of Plan and DS prior to sending to client and Case Montauk counsel	.60	492.00		203813 161
3/09/2022	MHT	BANKRU	Review and working on first draft of plan and prepare for responses to client's questions.	1.00	730.00		203813 39
3/10/2022	MGR	BANKRU	Conf call w/ E. Wilner, C. Rennett (counsel to E Wilner) M. Traison regarding draft plan and disclosure statement and broker retention/sales process issue	1.00	820.00		203813 129
3/10/2022	MHT	BANKRU	Correspondence to and from counsel regarding the plan and prepare for conference call discussion with client and his pre-bankruptcy counsel.	.20	146.00		203813 43
3/11/2022	MGR	BANKRU	Review and discuss proposed amendment to plan w/ E Wilner	.30	246.00		202792 361
3/14/2022	BLP	BANKRU	Review lender comments to plan	.40	306.00		202562 1
3/14/2022	BLP	BANKRU	Conference with M. Roseman re lender comments to	.40	306.00		202562 4

BTM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

 RUN#:
 BIM#: 0154333
 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Regu Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY
 DEMAND
 XC001
 22373 001 BANKRUPTCY
 6 PLAN & DISCLOSURE STATEMENT
 Opened Date.... 9/28/2021
 BANKRUPTCY

===== > T I M E < =====				=====		
- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg. Group# /Item#
3/14/2022	BLP	BANKRU	plan, revisions to same	.50	382.50	202562 5
			Discussion with C. Lynch re lender comments to			
3/14/2022	MGR	BANKRU	plan and disclosure statement	.70	574.00	203813 163
			Final review of draft plan and disclosure			
3/15/2022	BLP	BANKRU	statement	2.30	1,759.50	202563 1
			Revisions to plan documents per lender comments			
			and other issues			
3/16/2022	BLP	BANKRU	Continued work on plan and disclosure statement	1.60	1,224.00	202564 23
3/16/2022	BLP	BANKRU	Discussion with C. Lynch re 2 additional changes	.20	153.00	202564 31
			to documents			
3/16/2022	MGR	BANKRU	Review revisions to plan	.50	410.00	202792 589
3/16/2022	MHT	BANKRU	Correspondence among debtor and counsel and	.20	146.00	203813 79
			discussions regarding revisions to plan.			
3/16/2022	MHT	BANKRU	Receive and review revised plan.	.40	292.00	203813 81
3/17/2022	BLP	BANKRU	Conference with M. Traison re plan comments and	.20	153.00	202567 42
			status			
3/17/2022	BLP	BANKRU	Review lender and debtor changes to plan and	2.70	2,065.50	203813 165
			disclosure statement and revise accordingly			
3/17/2022	MHT	BANKRU	Examine correspondence to and from Reid Smith,	.30	219.00	203813 95
			counsel to lender, attention to noticing			
3/17/2022	MHT	BANKRU	procedures and hearing dates.	.20	146.00	203813 99
			Review revised versions of the draft of the plan			
			and disclosure including identification of			
			ownership chain and further correspondence from			
			Chuck Reynolds regarding relationships between			
			the LLCs and correspondence to client urging			
			review and need for execution tomorrow.			
3/17/2022	MHT	BANKRU	Questions from debtor re terms of plan.	.20	146.00	203813 101
3/18/2022	BLP	BANKRU	Draft motion to approve DS, order, ballot and	2.20	1,683.00	202191 4
			notice			
3/18/2022	BLP	BANKRU	Finalize plan and DS	.80	612.00	202191 5
3/18/2022	BLP	BANKRU	Emails with lender re final changes to plan	.20	153.00	202191 6
			documents			
3/19/2022	BLP	BANKRU	Finalize and file Plan, DS and motion to approve	.70	535.50	202191 1
			DS			
3/21/2022	BLP	BANKRU	Discussion with chambers re need to redo DS	.40	306.00	202575 25
			notice for in person hearing (.1); prepare and			
			file amended notice (.3)			
3/22/2022	MGR	BANKRU	Review plan and proposed retention application	.70	574.00	203813 143
			and emails regarding conflicting terms w/ J Tuso			
3/22/2022	MHT	BANKRU	Correspondence from counsel to secured lender	.20	146.00	203813 111
			regarding disclosure and plan and follow up			
			responsive correspondence.			
3/23/2022	BLP	BANKRU	Conference with M. Roseman re plan provision re	.40	306.00	202575 51

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

RUN#:
BIM#: 0154333
Time: 06993370
Cost: 2/23/2022 8/12/2022
2/23/2022 8/12/2022

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY
N Orig Attorney 9130 MICHAEL H TRAISSON 6 PLAN & DISCLOSURE STATEMENT
N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021
N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND
N Rept Attorney 999 MISCELLANEOUS ATTORNEY XC001
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

BANKRUPTCY

T I M E

- Date -	Wkng	Atty	Subm	Serv	Code	Description	Hours	Billable Value	Non-Chrg.	Group#	/Item#
3/23/2022	MHT			BANKRU		timing of marketing process, status of discussions re same	.30	219.00		203813	113
3/28/2022	MGR			BANKRU		Telephone meeting call to discuss negotiations with lender regarding critical dates in plan.	.60	492.00		202792	997
4/04/2022	MGR			BANKRU		Review plan and consider boot strap options w/out deal with Case Montauk	.60	492.00		204838	140
4/07/2022	MGR			BANKRU		Phone conf w/ client regarding plan terms and drafting questions	.70	574.00		205091	51
4/08/2022	BLP			BANKRU		Initial review of comments to plan from Case Montauk	.40	306.00		203359	8
4/08/2022	BLP			BANKRU		Review lender changes to plan documents	.40	306.00		203359	9
4/08/2022	MHT			BANKRU		Emails with lender counsel and M. Roseman re questions on certain changes, confirmation of others	.40	292.00		205091	9
4/10/2022	BLP			BANKRU		Review proposed plan of reorganization and redlining.	.60	459.00		203446	2
4/11/2022	BLP			BANKRU		Further revisions to amended plan documents and email to lender re same	.40	306.00		203738	38
4/11/2022	MGR			BANKRU		Review proposed plan modifications and discuss counter proposal with B Pollack (.3); Emails w/ client regarding same (.3)	.60	492.00		205091	53
4/11/2022	MHT			BANKRU		Review proposed plan of reorganization and revisions to disclosure statement.	.30	219.00		205091	15
4/12/2022	BLP			BANKRU		Conference call with Mr. Wilner and discuss the plan of organization and revisions to disclosure statement.	.30	229.50		205091	55
4/13/2022	BLP			BANKRU		Comms with lender and M. Roseman re status of plan deal, hearing on DS, logistics	.90	688.50		203738	51
4/13/2022	MGR			BANKRU		Several conferences and discussions with M. Roseman, M. Traison and client re plan, DS	.80	656.00		204838	121
4/13/2022	MGR			BANKRU		logistics and hearing, deal with lenders	1.20	984.00		205091	45
4/13/2022	MGR			BANKRU		Review plan issues w/ E Wilner					
4/13/2022	MGR			BANKRU		Prepare for and participate in lengthy phone conf w/ client regarding open issues w/ plan and Case Montauk	.50	410.00		205091	47
4/14/2022	MGR			BANKRU		Emails w/ J Tuso regarding vacate date and issues involving plan	.50	410.00		204838	130
4/18/2022	BLP			BANKRU		Continued review of plan drafting issues w/ E Wilner	.90	688.50		204073	5
4/18/2022	BLP			BANKRU		Several revisions to plan documents regarding vacate date, marketing period	.60	459.00		204073	6
4/18/2022	MGR			BANKRU		Several emails with lenders and client re plan changes re marketing period, vacate date	.50	410.00		205091	57
4/18/2022	MGR			BANKRU		E-mails regarding modification to plan language w/ J Tuso and client					

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CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

RUN#: 0154333
BIM#: 06993370
Time: 2/23/2022 8/12/2022
Cost: 2/23/2022 8/12/2022

22373 001 BANKRUPTCY
PLAN & DISCLOSURE STATEMENT
Opened Date.... 9/28/2021

BANKRUPTCY

Regu Attorney.. 2199 MATTHEW G ROSEMAN
N Orig Attorney 9130 MICHAEL H TRALSON
N Bill Attorney 2199 MATTHEW G ROSEMAN
N Resp Attorney 2199 MATTHEW G ROSEMAN
N Rept Attorney 999 MISCELLANEOUS ATTORNEY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

DEMAND
XC001

- Date -	Wkng Atty	Subm	Serv Code	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
4/18/2022	MHT		BANKRU	Examine language of revised plan and disclosure re timing. (Actual time .30)	.10	73.00		204122 56
4/18/2022	MHT		BANKRU	Conference call with Mr. Wilner explaining terms of revised plan.	.10	73.00		204122 60
4/18/2022	MHT		BANKRU	Correspondence to and from Mr. Wilner seeking approvals for plan and explanations for debtor. (Actual time 1.0 less .80 courtesies)	.20	146.00		205101 21
4/19/2022	BLP		BANKRU	Several emails re final amended plan changes	.40	306.00		204554 2
4/19/2022	BLP		BANKRU	Finalize and file amended plan (and refile per court request)	.50	382.50		204554 4
4/19/2022	BLP		BANKRU	Emails to UST, lender and court re amended plan (.3); emails with lender re dates for order approving disclosure statement (.2)	.50	382.50		204554 5
4/19/2022	MGR		BANKRU	Review proposed language change to plan re 3rd party purchaser and time to vacate and phone call w/ J Tuso regarding same	.50	410.00		205091 49
4/20/2022	BLP		BANKRU	Revise and finalize DS order and file same	.40	306.00		204554 31
4/20/2022	BLP		BANKRU	Conference with M. Roseman re DS hearing, confirmation	.20	153.00		205091 23
4/20/2022	MGR		BANKRU	E-mails and phone conf w/ B Pollack regarding DS hearing and service timing	.50	410.00		204838 304
4/21/2022	BLP		BANKRU	Amend plan documents per court request (.3); circulate and file same (.3)	.60	459.00		204555 32
4/21/2022	BLP		BANKRU	Discussions with lender re plan changes per court (.2); discussions with client re same (.2)	.40	306.00		204555 33
4/21/2022	BLP		BANKRU	Revise and upload order approving DS	.40	306.00		204555 34
4/21/2022	BLP		BANKRU	Oversee service of solicitation package and compile package	.30	229.50		204555 35
4/25/2022	BLP		BANKRU	Discussion with client re DS hearing questions	.20	153.00		205091 25
5/23/2022	BLP		BANKRU	Prepare draft of certification of ballots	.30	229.50		206427 17
5/23/2022	BLP		BANKRU	Begin preparation of confirmation order	.40	306.00		206427 18
5/23/2022	BLP		BANKRU	Begin preparation of confirmation affidavit	.50	382.50		206427 19
5/25/2022	BLP		BANKRU	Continued work on ballot certification and confirmation order	.50	382.50		206427 35
5/26/2022	BLP		BANKRU	Comms with lender re confirmation order (.2); continued work on confirmation affidavit (.5)	.70	535.50		206427 39
5/27/2022	BLP		BANKRU	File ballot certification	.20	153.00		206987 29
6/01/2022	BLP		BANKRU	Continued work on confirmation affidavit	1.20	918.00		206791 551
6/01/2022	BLP		BANKRU	Emails with C. Lynch re confirmation order	.20	153.00		206791 552
6/02/2022	BLP		BANKRU	Discussion with lender counsel re confirmation order changes (.2); review confirmation order accordingly (.2); file confirmation order (.2)	.60	459.00		207438 1
6/02/2022	BLP		BANKRU	Discussion with client re affidavit for confirmation and file same	.30	229.50		207438 2

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

 RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

 22373 001 BANKRUPTCY
 6 PLAN & DISCLOSURE STATEMENT
 Opened Date.... 9/28/2021

BANKRUPTCY

- Date -	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
6/02/2022	BLP			BANKRU	Comms with court and lender counsel re confirmation hearing date, lender concerns	.40	306.00		207438 3
6/03/2022	BLP			BANKRU	Follow up call with client regarding confirmation hearing and procedure (.2); refile confirmation order per court request (.2)	.40	306.00		207438 8
7/26/2022	BLP			BANKRU	Prepare MOL in support of confirmation	2.90	2,218.50		210586 2
7/26/2022	MGR			BANKRU	Review and revise confirmation memo	.70	574.00		210893 496
8/01/2022	MHT			BANKRU	Review of plan and confirmation preparations and correspondence with client. (Actual time 1.0 less courtesy reduction of .5 for net of .50)	.50	365.00		212319 10
8/03/2022	MHT			BANKRU	Preparation for and participation in strategy conference with client regarding confirmation and other issues.	1.00	730.00		212319 12
8/05/2022	BLP			BANKRU	Discussion with UST re plan confirmation, questions and status of bidding (.2); conference with MR re same (.2)	.40	306.00		211283 1
8/09/2022	MGR			BANKRU	Review plan and confirmation order regarding comments/question from US Trustee and continue preparation for confirmation hearing	1.50	1,230.00		212259 39
8/09/2022	MGR			BANKRU	Phone conf w/ W Birmingham regarding confirmation hearing and questions regarding plan	.30	246.00		212319 42
8/10/2022	BLP			BANKRU	Comms with M. Roseman and UST re confirmation order provisions (.3); finalize and file confirmation order (.2)	.50	382.50		212258 19
8/12/2022	BLP			BANKRU	Prepare notice of entry of confirmation order	.30	229.50		212258 26
Unbilled Professional Services							50,901.50	**	**
							65.50	**	.00

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
N Orig Attorney 9130 MICHAEL H TRAISSON
N Bill Attorney 2199 MATTHEW G ROSEMAN
N Resp Attorney 2199 MATTHEW G ROSEMAN
N Rept Attorney 999 MISCELLANEOUS ATTORNEY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

BILLING SUMMARY

22373 001 BANKRUPTCY
6 PLAN & DISCLOSURE STATEMENT
Opened Date.... 9/28/2021
DEMAND
XC001

RUN#: 0154333
BIM#: 06993370
Time: 2/23/2022 8/12/2022
Cost: 2/23/2022 8/12/2022

BANKRUPTCY

Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	41.90	765.00	32,053.50
MATTHEW G ROSEMAN	PARTNER	MGR	2199	18.00	820.00	14,760.00
MICHAEL H TRAISSON	PARTNER	MHT	9130	5.60	730.00	4,088.00
				65.50		50,901.50
						.00
						50,901.50

Unbilled Time
Unbilled Costs Advanced
Total Unbilled Time & Costs Advanced

Outstanding	Before	Value	After	Value
Unbilled Time	2/23/2022	.00	8/12/2022	.00
Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00

=====> No Accounts Receivable balance for this matter

=====>

M A T T E R S U M M A R Y <=====

Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date	Last Time Rept.
Tim Dollars Rpt	50,901.50	50,901.50	Cost Dollar Rpt	.00	.00	8/12/2022
Total Unbilled	.00	50,901.50	Total Unbilled	.00	.00	0/00/0000
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00	0/00/0000
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00	
Time Receipts..	.00	.00	Costs Receipts.	.00	.00	
Outstanding A/R	.00	.00	Outstanding A/R	.00	.00	
Realization....	.00%	.00%	Realization....	.00%	.00%	
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00	
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00	

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

RUN#: 0154333
 BIM#: 06993370
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 Cost: 2/23/2022 8/12/2022

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRASON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
 8 RETENTION/PROFESSIONAL COMP./FEE
 Opened Date.... 9/28/2021
 DEMAND
 XC001
 BANKRUPTCY

MONTAUK CLIFFS, LLC et al

===== >				T I M E <=====				=====			
- Date -	Wkng	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#				
2/23/2022	MGR	BANKRU	Review and revise application to retain Cullen and Dykman	.50	410.00		200919 137				
2/25/2022	BLP	BANKRU	Revise retention motion and send to client for review	.50	382.50		200851 63				
2/28/2022	BLP	BANKRU	Comms with UST re C&D retention documents	.10	76.50		200886 852				
3/08/2022	BLP	BANKRU	Review and properly categorize chapter 11 time for month	.30	229.50		202561 20				
3/08/2022	BLP	BANKRU	Letter to client with fee statement	.30	229.50		212319 3				
3/14/2022	BLP	BANKRU	Revise retention papers per UST comments	.30	229.50		202562 8				
3/15/2022	BLP	BANKRU	Finalize retention applications and send to client for review	.40	306.00		202563 8				
3/15/2022	MGR	BANKRU	Review retention amendments and execute application to retain Cullen & Dykman	.30	246.00		202792 424				
3/16/2022	BLP	BANKRU	Revise retention application for debtor comments (.4); emails with UST re same (.2)	.60	459.00		202564 24				
3/16/2022	BLP	BANKRU	File retention application and email to chambers with order	.30	229.50		202564 25				
4/11/2022	MGR	BANKRU	Revise retention of Hedgerow application and affidavit and forward to Preston Kaye	.50	410.00		205101 5				
4/12/2022	MGR	BANKRU	Revise retention affidavit per comments from P Kaye	.60	492.00		205091 73				
4/14/2022	BLP	BANKRU	Prepare and send March fee statement	.80	612.00		203876 28				
4/19/2022	BLP	BANKRU	Conference with M. Roseman and emails with lender re broker motion papers (.3); finalize broker motion (.3)	.60	459.00		205101 7				
4/19/2022	MGR	BANKRU	Finalize retention application for Hedgerow and related exhibits	.50	410.00		205101 9				
4/20/2022	BLP	BANKRU	Prepare notice of presentment of broker motion	.20	153.00		205101 11				
4/21/2022	BLP	BANKRU	Email to UST re broker motion (.1); finalize and file motion (.3)	.40	306.00		205101 13				
5/05/2022	BLP	BANKRU	Review and revisions to monthly fee statement	.50	382.50		205151 6				
5/06/2022	BLP	BANKRU	Comms with client re monthly fee statement	.30	229.50		205816 58				
6/06/2022	BLP	BANKRU	Prepare monthly statement	.30	229.50		207438 17				
7/07/2022	BLP	BANKRU	Finalize and send June fee statement	.20	153.00		208873 20				
8/03/2022	BLP	BANKRU	Prepare monthly fee statement and letter to client re same	.40	306.00		211176 8				

BIM300S

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 8 RETENTION/PROFESSIONAL COMP./FEE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND BANKRUPTCY Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY XC001
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

- Date -	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg. Group# /Item#
					Unbilled Professional Services	8.90 **	6,940.50	**

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	6.50	765.00	4,972.50
MATTHEW G ROSEMAN	PARTNER	MGR	2199	2.40	820.00	1,968.00
	Unbilled Time			8.90		6,940.50
	Unbilled Costs Advanced					.00
	Total Unbilled Time & Costs Advanced					6,940.50
	Outstanding	Before	Value	After	Value	
	Unbilled Time	2/23/2022	.00	8/12/2022	.00	
	Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00	

=====> No Accounts Receivable balance for this matter

Date 8/19/22 "CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
N Orig Attorney 9130 MICHAEL H TRAISSON
N Bill Attorney 2199 MATTHEW G ROSEMAN
N Resp Attorney 2199 MATTHEW G ROSEMAN
N Rept Attorney 999 MISCELLANEOUS ATTORNEY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
8 RETENTION/PROFESSIONAL COMP./FEE
Opened Date.... 9/28/2021
DEMAND
XC001

RUN#: 0154333
BIM#: 06993370
Time: 2/23/2022 8/12/2022
Cost: 2/23/2022 8/12/2022

BANKRUPTCY

B I L L I N G S U M M A R Y

M A T T E R S U M M A R Y			
Time Totals	Year to Date	Life to Date	Costs Totals
Tim Dollars Rpt	6,940.50	6,940.50	Cost Dollar Rpt
Total Unbilled	.00	6,940.50	Total Unbilled
Time Relief \$..	.00	.00	Costs Relief \$.
Time Billed-Reg	.00	.00	Cost Billed-Reg
Time Receipts..	.00	.00	Costs Receipts..
Outstanding A/R	.00	.00	Outstanding A/R
Realization....	.00%	.00%	Realization....
Time Write U/D.	.00	.00	Cost Write U/D.
Time A/R Adj...	.00	.00	Cost A/R Adj...
			Costs Totals
			Year to Date
			Life to Date
			Last Time Rept.
			Last Cost Rept.
			Last Bill Date.
			Last Receipts..
			Bill Thru Date.
			Bill Time Bdg.
			Bill Cost Bdg.
			A/R Credit Lmt.
			Credit Limit...

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY

9 PREPARATION/ATTEND COURT HEARING

Opened Date.... 9/28/2021

BANKRUPTCY

RUN#:

0154333

BIM#:

06993370

Time:

2/23/2022

Cost:

2/23/2022

MONTAUK CLIFFS, LLC et al

Date	Wkng	Atty	Subm	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
4/04/2022	BLP			BANKRU	Prepare for initial case conference, insurance hearing	.50	382.50		203102 1
4/04/2022	BLP			BANKRU	Attend initial case conference	1.50	1,147.50		203102 2
4/18/2022	BLP			BANKRU	Preparation for DS hearing	.60	459.00		204073 8
4/19/2022	BLP			BANKRU	Finalize prep for DS hearing	.70	535.50		204554 10
4/20/2022	BLP			BANKRU	Prepare for and attend DS hearing	2.50	1,912.50		204554 29
7/26/2022	BLP			BANKRU	Prepare outline for confirmation hearing and proposed QA for Wilner testimony	2.50	1,912.50		212319 20
7/26/2022	MGR			BANKRU	Review and revise client Q & A for confirmation hearing	.60	492.00		212319 22
7/26/2022	MGR			BANKRU	Review and revise confirmation hearing notes	.50	410.00		212319 24
7/27/2022	MGR			BANKRU	Review plan and disclosure statement and continued preparation for confirmation hearing	2.00	1,640.00		212319 28
8/01/2022	MGR			BANKRU	E-mails w/ E Wilner regarding confirmation hearing prep	.50	410.00		212319 26
8/01/2022	MGR			BANKRU	Review and edit Q & A for E Wilner direct testimony at confirmation hearing	.40	328.00		212319 30
8/02/2022	BLP			BANKRU	Conference with N.R. re bids, confirmation brief (.3); revise and file brief (.3)	.60	459.00		212319 32
8/02/2022	MGR			BANKRU	Preparation for confirmation hearing; Review plan, confirmation memo and prepare hearing notes	1.50	1,230.00		212259 7
8/02/2022	MGR			BANKRU	E-mails with E Wilner regarding preparation for confirmation hearing and forward copies of plan, confirmation affidavit and draft Q & A	.50	410.00		212319 34
8/03/2022	BLP			BANKRU	Attend client confirmation prep session	.40	306.00		211176 13
8/03/2022	MGR			BANKRU	Teams call with E Wilner to prepare for confirmation hearing	.50	410.00		212259 11
8/03/2022	MGR			BANKRU	Continued preparation for confirmation hearing; Review operating reports and claims register as well as confirmation hearing notes	1.50	1,230.00		212259 12
8/04/2022	MGR			BANKRU	E-mails to client regarding confirmation hearing and Covid restrictions	.30	246.00		212259 17
8/04/2022	MGR			BANKRU	Review of operating statements, claims filed and disclosure statement in preparation for confirmation hearing	.80	656.00		212319 36
8/04/2022	MGR			BANKRU	Continued review of direct examination of debtor	1.00	820.00		212319 38

Date 8/19/22 "CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
N Orig Attorney 9130 MICHAEL H TRAISSON 9 PREPARATION/ATTEND COURT HEARING BIM#: 06993370
N Bill Attorney 2199 MATTHEW G ROSEMAN DEMAND Opened Date.... 9/28/2021 Time: 2/23/2022 8/12/2022
N Resp Attorney 2199 MATTHEW G ROSEMAN XC001 Cost: 2/23/2022 8/12/2022
N Rept Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY
N Othr Attorney 999 MISCELLANEOUS ATTORNEY

T I M E			<=====>		
- Date -	Wkng Atty Subm	Serv Code	Description	Hours	Billable Value
8/05/2022	MGR	BANKRU	and prepare hearing outline	1.50	1,230.00
8/08/2022	MGR	BANKRU	Prepare for confirmation hearing	1.50	1,230.00
8/08/2022	MGR	BANKRU	Review and revise confirmation presentation and direct exam of E Wilner	.30	246.00
8/09/2022	MGR	BANKRU	Register appearance with Ecourt and confirm client availability	.70	574.00
8/10/2022	MGR	BANKRU	E-mails with client and chambers regarding illness of debtor rep and inability of Mr. Wilner to appear	1.00	820.00
Unbilled Professional Services				24.40 **	19,496.50 **

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

B I L L I N G S U M M A R Y					<=====>	
Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	9.30	765.00	7,114.50
MATTHEW G ROSEMAN	PARTNER	MGR	2199	15.10	820.00	12,382.00
Unbilled Time				24.40		19,496.50
Unbilled Costs Advanced						.00
Total Unbilled Time & Costs Advanced						19,496.50

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

 RUN#:
 BIM#: 0154333
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

 22373 001 BANKRUPTCY
 11 DISBURSEMENTS
 Opened Date.... 9/28/2021

BANKRUPTCY

MONTAUK CLIFFS, LLC et al

=====> No time recorded for this matter through 08/12/2022

C O S T S A D V A N C E D

- Date -	Atty	Subm	Wkng	Serv	Code	Description	Quantity	Amount	Group# / Item#
3/02/2022	999			00005		POSTAGE 03/02/2022 NV/BP	17.64		107385 5
3/07/2022	999			00005		POSTAGE 03/07/2022 NV/BP	10.95		107385 7
3/07/2022	999			00031		GC PHOTOCOPY, # of Copies: 120 @ 0.10 per unit	12.00		107385 9
3/21/2022	999			00005		PCSTAGE 03/21/2022, SK/LG	26.95		107385 1
3/21/2022	999			00005		PCSTAGE 03/21/2022, SK/BP	26.95		107385 3
3/21/2022	999			00005		PCSTAGE 03/21/2022, SK/BP	5.30		107385 11
3/25/2022	999			00001		CHASE CARD SERVICES Check # - 0000000001	1,738.00		107385 13
						CHASE CARD SERVICES, COURT FEES, CONFIRM#			
						5853128342 DTD 04/10/2022 FOR BANKRUPTCY PETITION			
						FILING FEE AT U.S. BANKRUPTCY COURT EASTERN			
						DISTRICT OF NEW YORK ON 02/23/2022, LG/KM			
3/31/2022	999			00051		THOMSON REUTERS - WE Check # - 000404819	7.96		107385 15
						ON-LINE RESEARCH (E106), TERSIGNI, AMANDA, INV#			
						845954080			
3/31/2022	999			00051		THOMSON REUTERS - WE Check # - 000404819	339.25		107385 17
						ON-LINE RESEARCH (E106), TERSIGNI, AMANDA, INV#			
						845954080			
3/31/2022	999			00051		THOMSON REUTERS - WE Check # - 000404819	135.57		107385 19
						ON-LINE RESEARCH (E106), TERSIGNI, AMANDA, INV#			
						845954080			
4/11/2022	999			00063		FEDEX Check # - 000405000	15.10		107627 1
						FEDEX, DELIVERY SERVICES/MESSENGER (E107),			
						INV#7-704-36938 DTD 03/28/2022 SENT TO OFFICE OF			
						THE UNITED STATES ON 03/21/2022, EU/RKM			
4/11/2022	999			00063		FEDEX Check # - 000405000	19.92		107627 3
						FEDEX, DELIVERY SERVICES/MESSENGER (E107),			
						INV#7-704-36938 DTD 03/28/2022 SENT TO J. TUSO,			
						C. LYNCH J. FALLER REED SMITH ON 03/21/2022, EU/RKM			
4/11/2022	999			00063		FEDEX Check # - 000405000	19.92		107627 5
						FEDEX, DELIVERY SERVICES/MESSENGER (E107),			
						INV#7-704-36938 DTD 03/28/2022 SENT TO JEFFREY			
						DAYTON ON 03/21/2022, BLP/RKM			

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CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

 RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

 22373 001 BANKRUPTCY
 11 DISBURSEMENTS
 Opened Date... 9/28/2021

BANKRUPTCY

 DEMAND
 XC001

===== > C O S T S A D V A N C E D < =====

- Date -	Wkng	Atty	Subm	Serv	Description	Quantity	Amount	Group#	Item#
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO CASE MONTAUK ON 03/21/2022, BLP/RKM	15.10		107627	7
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO JOHN LIPPINCOTT ON 03/21/2022, BLP/RKM	24.65		107627	9
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO SHORE PAIN-TING ON 03/21/2022, BLP/RKM	19.30		107627	11
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO SUFFOLK COUNTY COMPTROLLER ON 03/21/2022, BLP/RKM	15.10		107627	13
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO WEBER LAW GROUP ON 03/21/2022, BLP/RKM	15.10		107627	15
4/11/2022	999			00063	FEDEX FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#7-704-36938 DTD 03/28/2022 SENT TO U.S. UNDERWRITERS INSURANCE CO. 03/31/2022, BLP/RKM	15.10		107627	17
4/21/2022	999			00005	POSTAGE 04/21/2022, SK/BP	69.60		107624	1
4/21/2022	999			00005	POSTAGE 04/21/2022, SK/BP	16.52		107625	1
4/26/2022	999			00004	BONNIE POLLACK BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR PARKING AT TRAIN STATION, BLP/KM	6.00		107515	1
4/26/2022	999			00004	BONNIE POLLACK BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR TRAIN FARE FOR TRAVEL TO/FROM CENTRAL ISLIP, BLP/KM	15.00		107515	2
4/26/2022	999			00004	BONNIE POLLACK BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR UBER FARE FOR TRAVEL TO/FROM COURT, BLP/KM	13.98		107515	3
4/26/2022	999			00004	BONNIE POLLACK BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR UBER FARE FOR TRAVEL TO/FROM COURT, BLP/KM	13.73		107515	4
4/28/2022	999			00051	THOMSON REUTERS - WE Check # - 000405253 ON-LINE RESEARCH (E106), TERSIGNI, AMANDA, INV# 846112774	15.19		107624	3

Date 8/19/22 "CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 11 DISBURSEMENTS BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN 9/28/2021 Cost: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND 9/28/2021 BANKRUPTCY
 N Resp Attorney 999 MISCELLANEOUS ATTORNEY XC001
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

- Date -	Wkng	Atty	Subm	Serv	Code	Description	Quantity	Amount	Group#	Item#
						C O S T S A D V A N C E D		2,629.88		
						Unbilled Costs Advanced		2,629.88		

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

Name	Status	Initials	Number	Hours	Rate	Value
Unbilled Time				.00		.00
Unbilled Costs Advanced						2,629.88
Total Unbilled Time & Costs Advanced						2,629.88

Outstanding	Before	Value	After	Value
Unbilled Time	2/23/2022	.00	8/12/2022	.00
Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00

Serv	Description	Amount
00001	COURT FEES	1,738.00
00004	OUT-OF-TOWN TRAVEL	48.71
00005	POSTAGE	173.91
00031	GC PHOTOCOPY	12.00
00051	ON-LINE RESEARCH (E106)	497.97

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
 11 DISBURSEMENTS
 Opened Date.... 9/28/2021

DEMAND
 XC001

BANKRUPTCY

RUN#:
 BIM#: 0154333
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

=====>

<=====

C O S T S C O D E S U M M A R Y

Serv Code	Description	Amount
00063	DELIVERY SERVICES/MESSENGER (E107)	159.29
Total Costs Advanced		2,629.88

=====> No Accounts Receivable balance for this matter

>=====

M A T T E R S U M M A R Y

<=====

Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date	Last Time Rept.
Tim Dollars Rpt	.00	.00	Cost Dollar Rpt	2,629.88	2,629.88	2/24/2022
Total Unbilled	.00	.00	Total Unbilled		2,629.88	4/28/2022
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00	Last Bill Date.
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00	Last Receipts..
Time Receipts..	.00	.00	Costs Receipts.	.00	.00	Bill Thru Date.
Outstanding A/R	.00	.00	Outstanding A/R	.00	.00	Bill Time Bdgt.
Realization....	.00%	.00%	Realization....	.00%	.00%	Bill Cost Bdgt.
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00	A/R Credit Lmt.
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00	Credit Limit...

CULLEN AND DYKMAN LLP

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

 RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

 Regu Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAFISON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY
 DEMAND
 XC001
 22373 001 BANKRUPTCY
 12 MOTION PRACTICE
 Opened Date.... 3/07/2022
 BANKRUPTCY

MONTAUK CLIFFS, LLC et al

===== > T I M E < =====				=====			
- Date -	Wkng	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#
3/01/2022 BLP	ATTY	BANKRU	Prepare insurance financing motion	1.80	1,377.00		203813 5
3/01/2022 BLP	BLP	BANKRU	Review client comments to insurance financing motion and revise accordingly	.30	229.50		203813 7
3/01/2022 MHT	MHT	BANKRU	Review of motion for order allowing insurance premium payments including comments and follow up.	.20	146.00		212319 1
3/02/2022 BLP	BLP	BANKRU	Review insurance counsel changes to financing motion and revise accordingly, file motion	.70	535.50		203813 15
3/02/2022 BLP	BLP	BANKRU	Review and revise bar date motion and circulate same for comment	.60	459.00		203813 17
3/02/2022 BLP	BLP	BANKRU	Review lender comments to bar date motion and revise and finalize same	.50	382.50		203813 19
3/02/2022 BLP	BLP	BANKRU	File bar date motion and comms with court	.30	229.50		203813 21
3/02/2022 AT	AT	CHAP11	Draft and revise bar date motion to be filed with the court (3.4); review and analyze the Eastern District bankruptcy court guidelines relating to establishing date for filing proof of claims (0.6)	4.00	1,200.00		203813 1
3/07/2022 BLP	BLP	BANKRU	Revise bar date order, revise and serve notice	.30	229.50		202561 16
3/21/2022 BLP	BLP	BANKRU	Prepare and file amended notice of motion for insurance motion at chambers request	.30	229.50		202575 34
4/04/2022 BLP	BLP	BANKRU	Emails with chambers and insurance counsel re charge to order requested by court	.30	229.50		212319 6
4/05/2022 BLP	BLP	BANKRU	Revise and upload insurance order	.30	229.50		203102 14
4/05/2022 BLP	BLP	BANKRU	Emails with insurance counsel and court re revising order per court request	.20	153.00		212319 8
				9.80 **	5,630.00 **	.00 **	
				Unbilled Professional Services			

===== > No costs advanced recorded for this matter through 08/12/2022

BIM300S

CULLEN AND DYKMAN LLP

Page 40

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 12 MOTION PRACTICE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN 3/07/2022 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND Opened Date.... Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY XC001 BANKRUPTCY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

=====>

T I M E <=====

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

B I L L I N G S U M M A R Y <=====

Name

Status

Initials Number

Hours

Rate

Value

BONNIE L. POLLACK
 AMANDA TERSIGNI
 MICHAEL H TRAISSON

PARTNER
 ASSOCIATE
 PARTNER

BLP 2057
 AT 2431
 MHT 9130

5.60
 4.00
 .20

765.00
 300.00
 730.00

4,284.00
 1,200.00
 146.00

Unbilled Time
 Unbilled Costs Advanced

9.80

5,630.00
 .00

Total Unbilled Time & Costs Advanced

5,630.00

Outstanding

Before

Value

After

Value

Unbilled Time 2/23/2022
 Unbilled Costs Advanced 2/23/2022

.00

.00

.00

.00

=====> No Accounts Receivable balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 12 MOTION PRACTICE BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN 3/07/2022 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY
 =====> M A T T E R S U M M A R Y <=====

BANKRUPTCY

Time Totals		Year to Date	Life to Date	Costs Totals		Year to Date	Life to Date
Tim Dollars Rpt	5,630.00			Cost Dollar Rpt	.00		Last Time Rept. 5/25/2022
Total Unbilled	5,630.00			Total Unbilled	.00		Last Cost Rept. 0/00/0000
Time Relief \$..	.00			Costs Relief \$.	.00		Last Bill Date.
Time Billed-Reg	.00			Cost Billed-Reg	.00		Last Receipts..
Time Receipts..	.00			Costs Receipts.	.00		Bill Thru Date.
Outstanding A/R	.00			Outstanding A/R	.00		Bill Time Bdg.
Realization....	.00%			Realization....	.00%		Bill Cost Bdg.
Time Write U/D.	.00			Cost Write U/D.	.00		A/R Credit Lmt.
Time A/R Adj....	.00			Cost A/R Adj....	.00		Credit Limit...

BIM300S

CULLEN AND DYKMAN LLP

Page 42

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAYSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

22373 001 BANKRUPTCY
 13 TRAVEL
 Opened Date.... 3/21/2022

DEMAND
 XC001

BANKRUPTCY

RUN#: 0154333
 BIM#: 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

MONTAUK CLIFFS, LLC et al

=====		T I M E		=====	
- Date -	Wkng	Serv	Description	Hours	Billable Value
3/18/2022	MGR	BANKRU	Travel to and from Montauk for meetings with client and then with lender representative	5.00	2,050.00
4/20/2022	BLP	BANKRU	Travel to and from court for DS hearing	2.60	994.50
8/10/2022	MGR	BANKRU	Travel to and from court	1.30	533.00
				8.90	3,577.50
Unbilled Professional Services				**	**
					.00
					**

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 13 TRAVEL BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date..... 3/21/2022 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

BANKRUPTCY

===== > B I L L I N G S U M M A R Y <=====

Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	2.60	382.50	994.50
MATTHEW G ROSEMAN	PARTNER	MGR	2199	6.30	410.00	2,583.00
				8.90		3,577.50
						.00
						3,577.50

Total Unbilled Time & Costs Advanced

Outstanding	Before	Value	After	Value
Unbilled Time	2/23/2022	.00	8/12/2022	.00
Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00

=====> No Accounts Receivable balance for this matter

===== > M A T T E R S U M M A R Y <=====

Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date	Last Time Rept.
Tim Dollars Rpt	3,577.50	3,577.50	Cost Dollar Rpt	.00	.00	8/10/2022
Total Unbilled	.00	.00	Total Unbilled	.00	.00	Last Cost Rept.
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00	Last Bill Date.
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00	Last Receipts..
Time Receipts..	.00	.00	Costs Receipts.	.00	.00	Bill Thru Date.
Outstanding A/R	.00%	.00%	Outstanding A/R	.00%	.00%	Bill Time Bdgt.
Realization....	.00	.00	Realization....	.00	.00	Bill Cost Bdgt.
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00	A/R Credit Lmt.
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00	Credit Limit...

BIM300S

CULLEN AND DYKMAN LLP

Page 44

Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

Requ Attorney.. 2199 MATTHEW G ROSEMAN
 N Orig Attorney 9130 MICHAEL H TRAISSON
 N Bill Attorney 2199 MATTHEW G ROSEMAN
 N Resp Attorney 2199 MATTHEW G ROSEMAN
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY

DEMAND
 XC001

22373 001 BANKRUPTCY
 14 OPERATING REPORTS
 Opened Date.... 3/28/2022

RUN#:
 BIM#: 0154333
 06993370
 Time: 2/23/2022 8/12/2022
 Cost: 2/23/2022 8/12/2022

BANKRUPTCY

MONTAUK CLIFFS, LLC et al

=====>			T I M E <=====			=====		
- Date -	Wkng	Serv	Description	Hours	Billable Value	Non-Chrg.	Group# /Item#	
3/15/2022	BLP	BANKRU	Assist in preparation of Feb MOR	.30	229.50		203813	69
3/16/2022	BLP	BANKRU	Emails with client re MOR	.20	153.00		203813	77
3/17/2022	BLP	BANKRU	Finalize, file and email to UST with Feb MOR	.30	229.50		202567	35
4/11/2022	BLP	BANKRU	Assist in preparation of March MOR	.40	306.00		203738	40
4/12/2022	BLP	BANKRU	Revise and file amended MOR	.20	153.00		203738	45
4/15/2022	BLP	BANKRU	Emails with UST re MOR changes for unpaid fees, bank statements	.20	153.00		204073	3
4/19/2022	BLP	BANKRU	Revise and file amended MOR	.30	229.50		204554	8
5/06/2022	BLP	BANKRU	Assist in preparation of April MOR (.4); finalize and file same (.1)	.50	382.50		205816	59
6/08/2022	BLP	BANKRU	Assist in preparing and file MOR, and then modify to add unpaid fees	.50	382.50		207438	43
7/08/2022	BLP	BANKRU	Assist with June MOR and file same	.50	382.50		209808	4
8/03/2022	BLP	BANKRU	Assist with June MOR and file same, send to UST	.50	382.50		211176	12
Unbilled Professional Services				3.90 **	2,983.50	**	.00	**

=====> No costs advanced recorded for this matter through 08/12/2022

=====> No unapplied credits for this matter

=====> No trust activity balance for this matter

BIM300S

CULLEN AND DYKMAN LLP

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Date 8/19/22

"CONFIDENTIAL - SUBJECT TO ATTORNEY/CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES"

BILLING INFORMATION MEMO

Requ Attorney.. 2199 MATTHEW G ROSEMAN 22373 001 BANKRUPTCY RUN#: 0154333
 N Orig Attorney 9130 MICHAEL H TRAISSON 14 OPERATING REPORTS BIM#: 06993370
 N Bill Attorney 2199 MATTHEW G ROSEMAN Opened Date.... 3/28/2022 Time: 2/23/2022 8/12/2022
 N Resp Attorney 2199 MATTHEW G ROSEMAN DEMAND XC001 Cost: 2/23/2022 8/12/2022
 N Rept Attorney 999 MISCELLANEOUS ATTORNEY
 N Othr Attorney 999 MISCELLANEOUS ATTORNEY BANKRUPTCY

===== > B I L L I N G S U M M A R Y <=====

Name	Status	Initials	Number	Hours	Rate	Value
BONNIE L. POLLACK	PARTNER	BLP	2057	3.90	765.00	2,983.50
				3.90		2,983.50
						.00
						2,983.50
						2,983.50

Unbilled Time
 Unbilled Costs Advanced

Total Unbilled Time & Costs Advanced

Outstanding	Before	Value	After	Value
Unbilled Time	2/23/2022	.00	8/12/2022	.00
Unbilled Costs Advanced	2/23/2022	.00	8/12/2022	.00

===== > No Accounts Receivable balance for this matter

===== > M A T T E R S U M M A R Y <=====

Time Totals	Year to Date	Life to Date	Costs Totals	Year to Date	Life to Date
Tim Dollars Rpt	2,983.50	2,983.50	Cost Dollar Rpt	.00	.00
Total Unbilled	.00	.00	Total Unbilled	.00	.00
Time Relief \$..	.00	.00	Costs Relief \$.	.00	.00
Time Billed-Reg	.00	.00	Cost Billed-Reg	.00	.00
Time Receipts..	.00	.00	Costs Receipts.	.00	.00
Outstanding A/R	.00	.00	Outstanding A/R	.00	.00
Realization....	.00	.00	Realization....	.00	.00
Time Write U/D.	.00	.00	Cost Write U/D.	.00	.00
Time A/R Adj...	.00	.00	Cost A/R Adj...	.00	.00

Last Time Rept.	8/03/2022
Last Cost Rept.	0/00/0000
Last Bill Date.	0/00/0000
Last Receipts..	0/00/0000
Bill Thru Date.	0
Bill Time Bdgt.	0
Bill Cost Bdgt.	0
A/R Credit Lmt.	0
Credit Limit...	0

Exhibit G**Disbursement Summary**

Disbursement	Total
Court Filing Fees	\$1,738.00
Postage	\$173.91
Overnight Mail	\$159.29
Photocopies (\$.10/page)	\$12.00
Travel	\$48.71
On-line Research	\$497.97
TOTAL:	\$2,629.88